Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the matter of	)	
	)	
Amendment of the Amateur Service Rules	)	WT Docket No. 12-283
Governing Qualifying Examination Systems	)	
and Other Matters	)	

COMMENTS of Walter Thomas Loughney Jr., AJ4XM

I. INTRODUCTION

The purpose of these comments is to express limited support for the NPRM WT Docket No. 12-283, hereafter referred to as the "NPRM".

II. DISCUSSION

A. Granting Credit for Expired Licenses: Since there is no requirement that a member of the amateur radio service remain active other than periodically filing for license renewal, there would seem to be no practical difference between someone with an active license and someone with an expired license. However, I think a difference does exist. Someone who has demonstrated continued interest in the Amateur Radio Service by continuing to renew his/her license is more likely to be active or involved with the current state of the service than someone who for whatever reason did not bother to renew their license. Much like a license to operate a motor vehicle has to be renewed periodically. And periodically they generally require retesting of relative skills including rules and regulations, vision, and driving ability. If you forget to renew your driver's license they do not just issue you a new one. While there are different requirements in each state for grace periods, retesting, etc., they all require a retest at some point if expired.

The Amateur Radio Service changes more than most state driving rules and radio equipment changes more than most vehicles. I teach Amateur Radio licensing classes, and find many formerly licensed operators who have lost touch with the current state of things. I do not think a "lifetime" license in a technical field is a good idea. And in most fields reexamination is required or continuing education is required to renew a license. If this was just a "hobby" that may not be important, but it is actually a significant "Service" and being up to date with the current rules and procedures and technology is important.

I would therefore encourage the commission not to adopt the recommendation that expired licenses should be able to be reactivated without retesting of the applicant. And in fact would encourage the commission to not only require testing for expired licensees but to require the NCVEC to develop a renewal examination for existing licensees that would encompass current commission rules and regulations, bands and modes of operation and current technical practice. This would not be to the same detailed level for renewal as for initial license grants but adequate to show that someone is able to provide "service" when needed.

This could also be demonstrated by a NCVEC developed continuing education course and test.

I support expediting the 3 tier licensing system by granting any remaining Novices a Technician Class License and Advanced Class Licensees an Extra Class License.

B. Grace Period: I support reducing the renewal grace period to 6 months and increasing the time before expiration when renewal can be done to 180 Days.

C. Examination Administration: As noted in the NPRM the VECs and VE teams have done a good job of developing systems and policies which limit errors and reduce fraud. I think the presence of 3 VE's has gone a long way to making this work. As a VE myself, I can attest to the fact that we do catch errors in grading, take steps to prevent fraud, and administer a lot of paperwork. That is not to say that 2 VE's could not do a good job, but simply that having 3 VE's does a better job. Considering the number of VE's from all the VEC's there does not seem to be a real shortage of VE's issue. And while I appreciate that in some rural or more remote areas it may require more travel by the VE's and examinees, I don't think these exceptions are sufficient to change the rules.

I strongly oppose the suggestion that remotely monitored testing be allowed on any regular basis. I think this opens up too much chance for errors and fraud.

I think both the number of VE's and remote testing could be handled on a case by case basis with a waiver by the commission if sufficient grounds and test integrity were established. There are electronic testing services in many fields that are commercially operated and do a successful job of remote testing. But the fees for these services greatly exceed any fees that the VEC's charge and I think given the choice examinees would stick with the VEC's. at all test sessions.

D. Morse Code Examination: I fully support amending the Commission's Rules to reflect the elimination of Morse code and the related examinations to be phased in as existing forms are replaced. This is just an administrative issue.

E. Emission Types: A central purpose of the Amateur Radio Service is to advance the radio art and to promote the efficient use of radio spectrum. As such, I support the inclusion of types FXE and FXD as permitted emission types in the amateur service. Further I support letting the Amateur Radio community use new modes as they become available by notice to the FCC. Rather than have to wait and issue rules for each new mode. We have demonstrated great restraint in testing technology and ensuring we do not cause interference. But technological advance should not be hindered by continual need to get permission before development.

Respectfully Submitted,

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