December 24, 2012

Federal Communications Comments
Comments to NPRM dated October 2, 2012

My name is Ron Hashiro, amateur radio operator AH6RH. I am licensed amateur radio operator of 36 years, having held licenses from Novice class through 20 WPM Extra class. and am a Volunteer examiner.

Attached are my comments to the NPRM dated October 2, 2012 seeking information on a number of topics related to revising Part 97.

Ron Hashiro, AH6RH
1013 Prospect St. #618
Honolulu, HI 96822-3447

Sincerely,

Ron Hashiro
Amateur Radio Operator AH6RH

1. ! "# $ %&#'%(&)*+ , -%'.))I support giving credit for past licenses. I support giving examination credits up to ten years after the expiration of the license, in order that the applicant maintain a resemblance of proficiency in both technical and regulatory aspects. Similarly, I support giving CSCE credit for up to ten years after the issuance of the CSCE.

   I support giving Technician class operators licensed before March 21, 1987 credit for the current General class license exam.

   I support giving up to six months prior to file for a renewal of an existing license. With more fluid and mobile job opportunities today, a person may take a contractor engagement, be in the military overseas, or otherwise not be at home or in the country to file a license renewal. The current 90 day window may impose a hardship on those individuals.

2. / +#0 ,)1 , +%(-)2(+)3 , & , 4#5. I support a grace renewal period of one year from the expiration, after which the expired callsign becomes available for others. A period of six months is too short, as there are QSL cards that need to be processed and issuing the call to a new operator in the meantime may create confusion.

3. .6#&%'7)0#558%9&)4#%'%&9) : , +%(- . I support a waiting period of one year from the expiration, after which the expired callsign becomes available for others. A period of six months is too short, as there are QSL cards that need to be processed and issuing the call to a new operator in the meantime may create confusion.

; . ! "# $ %&#'%(&)< - $ %&%8'+#'%(&. I support maintaining three VEs be present for physical examinations.)

)

=. 3 , $ (' ,)> , 8'%&9.)))I support remotely administered exams, in which case a single VE needs to be present and the other administrators can observe via the Internet.

   During the Kalaupapa examination, the VEs were able to use Webcams to watch the participant remotely take the exam one at a time. The participant electronically entered the results on a web page, and the selected answers and the correct answers transmitted as PDF files to the remote VEs to grade and report back the pass/fail and the correct answer count.

   Performing remote testing involves more effort and verification than just the actual examination day. There was a level of difficulty ensuring that the remote

testing site could accommodate the Webcams within the preestablished Internet firewall security of the host organization. But, the benefit of being able to perform an exam to a remote location outweighs the technical and personal difficulties in getting the setup done.)

?. @(+8,)*(-,)!"#$%&#'%(&. I support deleting references to examination credit for Morse code in 97.307(f)(10).)
)

7. !$%88%(&8)>7:,8. I support emission type "X" for the second letter for voice (E) and data (F) emissions. Amateur radio operator should be able to use single time-slot and multiple time-slot emissions. The Motorola TDMA system has shown to be another effective and welcome addition among the tools for emergency communications. Knowledge gained within the amateur service can be leveraged with the commercial radio service and vica versa.

I request the immediate approval of a waiver to implement "X" type emissions so that amateur radio operators can implement and leverage the modulation type.