

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of the Amateur Service)	
Rules Governing Qualifying)	WT Docket No. 12-283
Examination Systems and Other)	
Matters)	
)	
)	
Amendment of Part 97 of the)	
Commission's Amateur Service Rules)	RM-11629
to Give Permanent Credit for)	
Examination Elements Passed)	
)	
)	
By Stephen Finberg)	
W1GSL)	
PG-1-10089)	
)	
To: The Chief, Wireless)	
Telecommunications Bureau)	
)	
_____)	

Reply comments to Wade, Whedbee, Varnounis and Melachrinis

**I am an Extra class amateur operator licensee of W1GSL and trustee of W1XM.
I am a Volunteer Examiner affiliated with the W5YI and the ARRL VECs.
I have coordinated a monthly VE session in Cambridge MA since the
inception of the VE program. The following comments are mine alone.**

1 Granting credit for previously expired licenses.

This proposal opens a can of worms most VE groups will find difficult to address...

The really difficult problem is verifying the individual presenting is the same one as named in the data base or on the presented old paperwork.

How do we know the senior citizen applying to renew is the same fellow who last held an amateur license as a teenager while living three states away?

How are we to know the John Smith before us is the same John Smith who's Extra expired 12 years ago in the ULS database? What if he is claiming credit for an expired license from before the ULS data base was established.. While call books have been suggested they carry no personal ID information other than name...

Verifying credit for expired CSCEs is even more difficult to confirm as I know of no long term CSCE data base.

This task differs significantly from the Tech upgrade to General situation using old element 3 credit, because in our experience almost all of those upgrading had maintained the continuity of their Tech license.

While the considerable burden of documenting the original license must fall on the applicant, it is clear evaluating decades old documentation will be a burden to the VE team conducting the exam session.

These are very hard tasks which even the Commission has handed off to contractors in the limited case of old Techs looking to claim credit for element 3..

If the Commission really wants to institute permanent credit, it needs to make available a full data base of all eligible applicants and guidelines to qualify individuals. It is hard enough to verify current documents, an exhaustive personal history search is too much to ask of a volunteer group. Disputes over old documentation could lead to difficult and time consuming arguments at a exam session.

An office at the FCC or a contractor with full access to all the data base information may be a better route for renewing these old licenses, however at considerable expense.

Why bother with such difficulties?

Over all I feel there is no need for reinstating these old licenses without examination. It would be much less work for all concerned just to re-examine. Anyone with previous amateur experience and just a little reading to refresh the current rules should have no problem passing today's tests.

For our monthly exam sessions, on the night of the exam we post directions from a busy main entrance. Over the past few years we have had almost a dozen ex-hams see the signs and decide to try the test without studying. Without exception they have all passed at least the Tech and a few have passed the Extra.

Lifetime Licenses

Martin Wade alludes to the FCC commercial operators licenses being changed to lifetime grants.. I will point out that they were only converted to lifetime terms on timely renewal, not grandfathered from expired status.

I would be in favor of lifetime Amateur licenses, if the commission wants to remove the small burden of ongoing renewals.

Varnounis and others compare the lifetime knowledge gained from a university degree to the ham exam process. This is not a fair comparison, while undoubtedly a higher education is useful, it grants no specific privileges. The amateur exam process is designed to certify knowledge of and the specific skills to safely and legally operate amateur radios and grants said privileges. A much better analogy is the exam and renewal process needed for drivers licenses. A quick internet search reveals most states have expiration and retest policies similar to the current FCC amateur system. For example Massachusetts will renew without a skill test as long as you keep the license current. After a grace period of four years, to renew an expired license requires a complete (written and road test) re-examination.

2 On the matter of Two Examiners.

I feel three volunteer examiners is the minimum needed to insure integrity and error free sessions. While some commercial exam centers run with only a single proctor these are usually full time employees who run test sessions daily. Our VEs are volunteers who participate in a exam session only a few times a year. Over the years having a third VE at each session has caught many oversights that got by the other two examiners.

3 On the matter of remote exams.

A live local proctor should be a requirement at each session. It is the only way to authenticate the applicant's ID and that they are unassisted.

Even then having only a single VE at the test site leaves a vulnerability to buddy cheating especially in a very small remote community.

Qualifying the proctor if they are not an accredited VE introduces many problems, and may come back to a "professional" test center...

Professor **Whedbee** of Park University seems to think an ID number and a secret password is sufficient to authenticate a candidate for his university courses. This may work if he establishes a long continuing relationship over a term with the applicant, but would do nothing to prevent an applicant having his buddy sit in for him in a one time ham exam.

Free un-proctored exams for massive online courses such as MIT's EDx program are somewhat controversial. Proctored exams which would offer a better completion credential at a significant cost, are now being considered.

The additional cost, complexity and risks should limit the use of online remote exams to situations where it is impractical to offer conventional VE sessions. While Alaska comes to mind, the original "you can't get there from here" quote comes from Maine here in New England and we certainly have no shortage of VE sessions here.

Summary

In summary I feel extending renewal credit for expired licenses will impose an unjustifiable burden on the VE session team. Extending credit for expired CSCEs would impose an even greater burden as there is no way to verify the old documents.

Having a minimum of 3 volunteer examiners at each session has worked well for almost 30 years and should not be changed.

Remote exam sessions present unique costs and risks and should be used only rarely when a conventional exam session is impractical.