

Dear ARRL Members of the Midwest Division,

The fees Notice of Proposed Rulemaking was published in this morning's Federal Register (<https://tinyurl.com/yyk8f2yp>). The deadline for Comments is November 16, and the deadline for Reply Comment is November 30. I urge you to first read the Notice at this link and then submit your comments opposing this proposed fee for amateur licensing actions.

You may submit comments, identified by MD Docket No. 20-270, by either of the following methods:

Federal Communications Commission's Website: <http://apps.fcc.gov/ecfs/>.
Follow the instructions for submitting comments.

People With Disabilities: Contact the FCC to request reasonable accommodations (accessible format documents, sign language interpreters, CART, etc.) by email: FCC504@fcc.gov or phone: 202-418-0530 or TTY: 202-418-0432.

The following information, provided by ARRL General Counsel, David Siddall, K3ZJ, is provided to facilitate your comments to the FCC:

Good Arguments Against FCC Fees for Radio Amateurs

1. Amateurs contribute to the public good. In many areas they provide an emergency communications backbone capability at no taxpayer cost. Consistently we have witnessed storms and natural disasters completely wipe out internet, cellular, and other means of communication. Radio amateurs often fill that void on an unmatched, flexible basis when needed. One recent example is the California wildfires.
2. Unlike operators in other FCC licensed services, Amateur Radio operators by law – domestic and international -- must eschew using their license for any pecuniary interest. Amateurs are prohibited from earning or charging any money for any communications activity. The expenses for their equipment and activities come out of their own pockets, with no opportunity for reimbursement or payment of any kind.
3. The United States is experiencing a severe lack of RF engineers and expertise at the very time it is needed by the burgeoning wireless industries. Amateur radio is helping to meet the deficit, but much more is needed and youngsters (High School and College-aged) are least able to afford licensing fees. RF knowledge and related digital expertise is needed to maintain U.S. leadership in wireless industries. At a minimum, young people (below the age of 26) should be exempt from the proposed license fees.
4. Amateur radio is self-regulating. (a) Amateur examinations are written and administered by radio amateur volunteers. (b) Examination results and paperwork most often are submitted electronically to the FCC. Electronic submission could be required if there would be a cost savings to the Commission. (c) Amateur radio educational classes are conducted by volunteers who by-and-large do not charge fees or tuition for teaching. (d) The amateur service, in cooperation with the FCC's Enforcement Bureau, has a volunteer core that monitors the amateur airwaves with programs that try to prevent their misuse before FCC involvement might be needed. The amateurs also

observe non-amateur signals, both within amateur spectrum and outside it, and report unusual or suspicious signals.

5. Amateur radio continues to be a source of significant technological innovation that should be encouraged, not discouraged.

Some Additional Suggestions

- I do not recommend arguing that the \$50 fee every 10 years, which amounts to \$5.00 a year, will “kill” amateur radio, even though as proposed this is for each covered application, which includes upgrade applications. Tech-General-Extra could be \$150, if exams were taken at different sessions, would be a substantial amount. But it “rings” the wrong way to say the whole service turns on \$5/year for each licensee.
- The Commission argues that the charges are required by the statute. The word used is “shall”, which is mandatory, not optional. But the statute does not set the amount, nor does it prohibit reasonable exceptions – evidenced by the Commission’s proposal to exempt from fees administrative update applications based on policy grounds.
- This is not “aimed at amateur radio to kill it.” There is a long history and precedent on charging fees for the licensing service involved, just as there is for passports, green cards, driver licenses (issued by states), etc. Better to make pertinent arguments on why the fees would impair the public benefits of the amateur radio service than argue that the whole service might die as a result of a fee that, in fact, is less than the fee many of us paid in the 1960’s and 1970’s, including myself as a struggling high school and college student (if adjusted for inflation).
- For background: this proceeding is being handled by FCC staff unfamiliar with amateur radio. It is being handled in the FCC’s Office of Managing Director (OMD), not in the Wireless Telecommunications Bureau where the amateur-specific Part 97 matters are handled. The focus of OMD is accounting – budgets and the like for the entire Commission. The fee proposals cover every FCC license and service across the board and the consideration was directed by Congress. I recommend keeping “ham jargon” out of your comments as it won’t be understood by the intended recipients.

ARRL Midwest Division
Director: Roderick K Blocksome, KODAS
k0das@arrl.org
