

The ARRL Letter
May 2, 2019

ARRL Reply Comments Stress Need to Update Technician Privileges in a Digital World

In reply comments to the FCC (comments on comments already filed) on its [Petition for Rule Making](#) (RM-11828), ARRL has stressed that updating HF privileges for the entry-level Technician license "is the sole subject and intent" of the petition. ARRL filed its reply comments on April 29, urging the FCC to disregard comments irrelevant to its petition and maintaining that Technician privileges must be relevant within the context of today's technological environment.

"[T]he increasingly rapid pace of change in communications technologies, coupled with the national need for self-training in science, technology, engineering, and math" necessitate the rule changes requested, ARRL asserted. "ARRL made its request because of the gap between today's digital technologies and the privileges accorded the current entry-level Technician license." ARRL characterized its proposal to update the rules as "balanced and modest."

"If adopted, there would be no change to the operating privileges for all license classes other than those of the Technician class," ARRL said. In 2018, ARRL asked the FCC to expand HF privileges for Technician licensees to include limited phone privileges on 75, 40, and 15 meters, plus RTTY and digital mode privileges on 80, 40, and 15 meters. The FCC invited comments on the proposal in April.

ARRL pointed out that some comments filed on its petition address subjects related to other open proceedings rather than expanding Technician privileges, citing comments cross-filed in such proceedings as WT Docket 16-239, RM-11708, RM-11759, and RM-11831. "Those filings should be considered in the proceedings that they address, rather than here," ARRL said.

ARRL said some opposition appears based on fears of increased interference potential due to additional digital operation by Technicians. "It is improbable that all, or even a majority, of Technician licensees suddenly would develop a passion for the same digital technology," ARRL said. "Our hope and expectation is that many will engage with digital modes on the high-frequency spectrum at issue, but it is unrealistic to suggest that every Technician licensee blessed with new privileges would suddenly appear on the same band."

The comments note the development of very efficient digital modes, such as FT8, which occupies just 90 Hz of spectrum per signal. "The experience with FT8 clearly demonstrates the attraction of the digital modes *and* the spectrum efficiencies that can be achieved," ARRL said. "This is why opening up limited digital opportunities to new radio amateurs so clearly would serve the broad public interest as well as the specific purposes of Amateur Radio in experimentation and innovation, as enumerated in the governing FCC rules."

ARRL further said that comments regarding disagreement on the definition of encryption for masking the content of certain digital transmissions are also "out of place in this proceeding" and "should not delay initiation of a proceeding" proposing to update Technician privileges.

"Technology has changed dramatically in the Amateur Radio domain, and ARRL believes the requested Technician license enhancement would foster the regulatory goals for the Amateur Service and continue to increase amateurs' historical experimentation and service in a meaningful way," ARRL concluded.

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