

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

In the Matter of)
)
Amendment of the Schedule of Application Fees) MD Docket No. 20-270
Set Forth in Sections 1.1102 through 1.1109 of the)
Commission’s Rules)

To: The Commission

COMMENTS OF
CULVER CITY AMATEUR RADIO EMERGENCY SERVICES
("CCARES")

CCARES is the Amateur Radio Emergency Communications Service ("ARES") serving the City of Culver City, California. It is an affiliate of the American Radio Relay League ("ARRL") and an affiliated member of the larger regional ARES network in Southern California. CCARES licensed amateur radio operator members provide critical public safety emergency communications serving the residents of Culver City and Culver City’s Community Emergency Response Team ("CERT"). CCARES also serves as a source of Volunteer Examination Coordinator ("VEC") authorized amateur radio volunteer examiners ("VEs") under the Greater Los Angeles Amateur Radio Group VEC ("GLAARG").

CCARES submits these Comments on the Commission’s Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding in opposition to charging fees for amateur license applications.¹

On November 16, 2020, the ARRL submitted its comments in this NPRM ("ARRL Comments"). CCARES joins in and supports the ARRL Comments in opposition of the NPRM

¹ Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 through 1.1109 of the Commission’s Rules, Notice of Proposed Rulemaking, MD Docket No. 20-270 (FCC 20-116, rel. Aug. 26, 2020), 85 Fed.Reg. 65566 (publ. Oct. 15, 2020).

for all of the reasons set out in the ARRL's Comments and supplements the ARRL's Comments with our comments in light of the ARRL Comments.

Amateur radio operators are not allowed to profit from the license fees they collect on behalf of the *reimbursements* set out by the various Volunteer Examination Coordinator as permitted by the FCC. Those fees are only to reimburse for the actual cost of testing and license issuance. See 47 C.F.R. § 97.527.² This is consistent with the voluntary and experimental nature and a “fundamental purpose” of the amateur radio service. See 47 C.F.R. § 97.1. CCARES, through its operation of the CCARES repeater (K6CCR) and the Amateur Radio Disaster Emergency Network (“AREDN”) interconnections maintained by CCARES, and through CCARES members, expend significant funds to construct and maintain emergency communications facilities to be immediately ready for use during natural and human-made emergencies.

For the Commission to institute a license fee schedule for amateur radio operators, as proposed in the NPRM, would significantly impact our members' abilities to maintain their station equipment in modern, ready condition for those emergency service responses that are at the core of our public service mission. That said, however, it is vital that the Commission understand and recognize that our mission mirrors other ARES groups and members throughout the country; we are only one representative of the efforts made by our members to serve the public, along with many tens of thousands of other ARES groups and independent amateur radio operators in the U.S.

The FCC's proposed fee schedule in the NPRM will produce what is at best a rounding error in the significant license fees collected by the Commission in spectrum auctions, and from license fees it collects from commercial for-profit entities, all of which go into the Treasury to serve funding the Commission. We cannot see any rational basis to connect the proposed fees in the NPRM to the actual cost of licensing, with the majority of actual work being performed by VEs at no charge, and VECs that make the data entries into the Commission's licensing system for new licenses, license upgrades, and license renewals.

² “VEs and VECs may be *reimbursed* by examinees for out-of-pocket expenses incurred in preparing, processing, administering, or coordinating an examination for an amateur operator license.” (Emphasis added.)

All of the above said, CCARES respectfully requests that the Commission remove all of the Amateur Radio service licensing fees set out in the NPRM to allow and encourage amateur radio operators to do exactly that this service was established to do: provide a body of trained and licensed communicators to utilize the “amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.”³

Respectfully submitted,

Culver City Amateur Radio Emergency Service (CCARES)
by

//Kevin Sherwood//

Kevin Sherwood, AJ7C, President@ccares.net

joined by CCARES Board Members:

Mr. Steve Herbert, K6CRW, Vice.president@ccares.net

Mr. Doug Smith, Kj6OGX, Secretary@ccares.net

Dr. Mike Landau, K6MDL, Treasurer@ccares.net

Mr. David Golden, KG6QEB, At.large@ccares.net

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³ See 47 C.F.R. § 97.1(a).