

A Paper Tiger?

Normally, the term “paper tiger” is used to refer to someone (person or organization) who wants you to think he’s a lot tougher than he really is. In this case, though, I’m referring to someone who makes you do so much paperwork that when you’re done, you feel as though you’ve been mauled by a real tiger. That “someone,” in this case, is the FCC.

In the past few weeks, I received two letters in the mail, each of which I should have been able to answer quickly and easily. But no, these letters had to do with dealing with the FCC. Between the two of them, I spent most of a full day tracking down answers, and explaining one of them was so complicated that it became the subject of W5YI’s “Washington Readout” this month.

Question #1

That question, from Don Lampkin, WA2HMB, asked simply how one goes about filing a petition with the FCC. Keep in mind, as Fred points out in his column, that petitioning the government for a redress of grievances is a basic right of the American people, guaranteed by the First Amendment to the Constitution. So I was really quite surprised, in scouring the FCC website, to find *absolutely no reference* to the process of filing a petition. The Commission has an excellent online system for filing comments electronically in response to petitions that have already been filed, but there is no way to submit a petition online and there are no instructions on how to do so on paper. Apparently, the FCC wants petitions to be filed only by those people (read communications lawyers) who are already “in the know.” John Q. Public may have a constitutional right to file a petition, but the FCC sure isn’t going to help him! We will, though. Be sure to read Fred’s column, starting on page 56, and then you’ll be one of those “in the know” as well!

Question #2

The second letter came from Warren Barden, KA2WQJ, an elderly gentleman who had been inactive for some years, but recently decided he wanted to get back on the air. He asked about getting on the air from his retirement community and about the possibility of operating HF mobile. He also noted that he had lost his original license document. Even though you no longer need a paper copy of your license (as long as you’re in the FCC’s database, you’re “legal”), most of us still like to have that piece of paper. So I printed out a “reference copy” of KA2WQJ’s license to mail to him. I noticed that the FCC still had his old address in the database, and wrote that he would have to update the records with his new address, and went to print out a copy of Form 605 that he could fill out and mail in. What an incredibly complicated and confusing document!

The “package” is 11 pages long, consisting of nine pages of instructions (including one on how it is in compliance with the Paperwork Reduction Act of 1995 and another listing all of the “official” 2-letter state/territory abbreviations) and the form itself, which is two pages long. Part of the reason for so many instructions is that this “Quick-Form Application” is for use by licensees in five different FCC-licensed services, Ship, Aircraft, Amateur, Commercial Operator and GMRS, the General Mobile Radio Services. Actually, there are 13 pages altogether, since hams are also instructed to

*e-mail: <w2vu@cq-amateur-radio.com>

download Schedule D (one page of instructions and a one-page form), “Information and Instructions for Additional Data in the Amateur Radio Service,” only to discover afterward that you only need it if you are applying to change your callsign. But if you *are* applying for a vanity call, you need to pay a fee, which requires filing Form 159 (Remittance Advice), which is another two-page form with three pages of instructions.

Now, down at the bottom of the web page from which you make these selections, you are told that for “simple purposes,” “you may retrieve all the necessary forms for the purpose of AU, CA, DU, RO, or WD only with FCC 605FS.” Got that? Well, I downloaded this supposedly simplified package ... and it was 21 pages long! And it didn’t even include Schedule D...

Granted, the FCC will allow you to file online—if you have a computer and internet access—which is not always the case; and both the ARRL and W5YI VECs will process applications for license changes using the much shorter and simpler NCVEC Form 605. W5YI-VEC charges \$8 for this service; ARRL provides it free to members and charges \$14 to non-members (this service is available for non-vanity renewals as well as address changes and other administrative updates; vanity renewals are also available at higher cost). Considering the complexity of the “do it yourself” approach of dealing directly with the FCC, I would say that these fees are bargains. Make use of these services. You will thank yourself for it.

But the real point here isn’t to promote the services provided by our friends at W5YI and ARRL VECs. They shouldn’t need to provide these services. Dealing with the FCC on such simple matters shouldn’t be so complicated that you need a third party to help you do it. Making a simple change, whether it’s an address change (remember, the FCC *requires* that you keep an up-to-date address on file) or a routine renewal, should be simple, whether you are submitting the information online or on paper. Likewise, making it so difficult to know how to properly file a Petition for Rule Making does not show a lot of respect for the Constitution or the people.

Acting FCC Chairman Michael Copps reminded the Commission’s staff on his first day in the top spot that the FCC needs to become more responsive to its “stakeholders.” One way in which the FCC can accomplish this goal is to make it easier for us stakeholders to deal with the Commission, whether we’re asking for a change in the rules or just submitting a change of address. It’s time to tame the paper(work) tiger.

New CQ WW Contest Category

The CQ World-Wide DX Contest Committee has decided to create a new competition category, called the Xtreme category. The goal is to encourage participation in the contest by hams who are using technologies that don’t currently fit into any of the other categories—such as split-site operation with internet linking. The plaques for the two winners (one SSB, one CW) will be sponsored by Tim Duffy, K3LR, in memory of John Kanzius, K3TUP. Details of the new category can be found in this issue on page 32, and Tim’s reminiscences about K3TUP can be found in this month’s “Contesting” column on page 106. Thank you to the CQ WW Committee for all of your hard work in developing this new category, and to K3LR for sponsoring the K3TUP memorial plaques. 73, W2VU