

September 5, 2010

Managing Director
ECTEL
PO Box 1886
Vide Boutielle
Castries, St. Lucia, W.I.

Dear Sirs:

This letter is in response to your Request for Comments on the Draft Amateur Radio Regulations.

I am an active amateur radio operator both in Dominica and the United States. I am an engineer and computer scientist whose original work on protocols for the Internet grew out of my activities in Amateur Radio. I am also an educator making use of Amateur Radio in the classroom. Therefore I have a very strong interest in promoting the continued existence and growth of Amateur Radio.

I find that I am in agreement with most of your proposed rules. There are a few to which I would like to address my comments.

Section 5: Commission to Approve Equipment

Paragraph (1) of this section states:

An Amateur Radio Station Licensee shall not use and amateur radio station unless such equipment has been approved by the Commission for that purpose.

The problem with this rule is twofold:

1. There are literally thousands of pieces of amateur radio equipment available, some of which is no longer manufactured and some of which has been modified from commercial or military use. It is virtually impossible to test all equipment that is available for use on the amateur bands. Therefore this rule would seriously curtail amateur radio activity.
2. Requiring approval for all equipment precludes experimenting and homebuilding.

Recommendation:

1. Accept existing type acceptance from government agencies in other governments, e.g. the US FCC. If a device has been approved by the FCC for use on the amateur bands, grant it tacit approval. This will reduce workload and “grandfather” equipment already in use.
2. In order to permit experimenting and homebuilding, instead of requiring approval, require instead signal quality standards for things like spectral purity, frequency stability, etc.

Section 6: Applications for an Amateur Radio Station Licence

Paragraph (1)(c) states:

“be at least 12 years of age.”

In addition, paragraph (2) states:

The Commission shall ensure that any application for an Amateur Radio Station Licence by a person under the age of 18 is countersigned by the applicant’s parent, guardian, or by any other

person approved by the Commission for that purpose, and that person shall be responsible for ensuring compliance with the licence conditions, until the licensee has reached the age of 18.

The problem with the age limit of 12 years is that it is reasonable for amateurs under the age of 12 to operate a station properly. I am a professional educator in the United States and I actively use Amateur Radio in the classroom. Most of my students ages 10 and up earn their Amateur Radio Licence and then go on to set up a station at home, which they then use in a responsible fashion. Your rule would preclude that.

The problem with requiring a parent or guardian to assume responsibility for an Amateur under the age of 18 is that the parent is most likely not an Amateur Radio operator and thus has no background or ability to determine whether or not the station is being operated properly.

Amateur Radio has always been self-policing. The amateur community already does an excellent job of policing its operations and hams have always mentored younger hams to ensure that they learn what they need to learn in order to operate their stations safely, effectively, and courteously.

Recommendation:

Eliminate any age limit. If a young person is able to learn the material well enough to pass the test, he/she is old enough to operate a station properly. My own 10-year-old students demonstrate this every day.

Tables A, B, and C – Frequency Privileges

The frequencies listed tend to be very specific. This precludes new modes and methods of operation. My recommendation is to make the spectrum allocations simpler and rely more on amateur-developed band-plans that allow for flexibility.

In addition the power levels seem arbitrary. The difference between a power level of 800W and 1500W is less than 3dB. This is not a significant difference. It would be simpler (and in keeping with activities in other countries) to use fewer different power levels, e.g. allow the General and Advanced licensees 1500W in all bands.

Likewise the difference between 50W and 100W is only 3dB. Since most commercial amateur HF transceivers put out 100W, it would be reasonable to allow Novices 100W output.

The low power levels available to the General and Advanced class licensees in the VHF and UHF spectrum precludes such modes as Earth-Moon-Earth (EME – “Moonbounce”), tropospheric scatter, meteor scatter, etc. These modes require high power in order to work. That suggests that a power level of 1500W in these bands for these modes is quite reasonable.

The tables make no mention of bands above 70cm (420MHz-450MHz). What about the 902MHz, 1.2GHz, 2.4GHz, 3.4GHz, 5.6GHz, 10GHz, 24GHz, and higher bands? Will EC hams be able to use these bands? If so, the rules should include them

Thank you for this opportunity to comment on the new proposed regulations.

Sincerely,

Brian Lloyd, WB6RQN/J79BPL
US Amateur Extra
3191 Western Dr.

Cameron Park, CA 95682
USA

+1.916.367.2131
brian@lloyd.com