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Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Gentlemen:

After discussions with others concerning the wording of the original petition to change the identification procedure for the Amateur Radio Service as contained within 47 CFR Part 97 Section 97.119(a) several individuals believe that requiring the identification of the station during the first transmission placed an undue burden on those operators! However, there still needs to be a way to reinstate the "3-minute rule" to legalize what has become common practice in the Amateur Radio Service.

This can be accomplished by adding an "exception" to the present Section 97.119(a) which reads as follows:

(1) If identification is made during the first transmission and when the total communication is less than 3-minutes, the transmitting of its assigned call sign at the end of the communication may be omitted except as provided for in Section 97.115(d).

A revised petition for making these changes is attached.

Respectfully submitted:

Glen E. Zook, K9STH

Revised Petition for modification of rule 47 CFR Part 97 Section 97.119(a)

Submitted by

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10 October 2011

The present section 97.119(a) reads as follows:

(a) Each amateur station, except a space station or telecommand station, must transmit its assigned call sign on its transmitting channel at the end of each communication, and at least every 10 minutes during a communication, for the purpose of clearly making the source of the transmissions from the station known to those receiving the transmissions. No station may transmit unidentified communications or signals, or transmit as the station call sign, any call sign not authorized to the station.

Unfortunately, the “must transmit its assigned call sign on its transmitting channel at the end of each communication” is routinely being violated by hundreds, even by thousands, of amateur radio operators almost every day

Often, when an amateur radio operator is communicating with “DX” stations, and almost universally when participating in contests, the transmitting of the assigned station call sign at the end of the communication is omitted. There are many excuses as to why the identification is not given during the last transmission as required by present regulations. However, the omission of the call sign at the end of the communication is still a direct violation of present regulations.

In years past, the regulations pertaining to the Amateur Radio Service included what was called the “3-minute” rule. This rule basically required station identification during the first transmission and, if the total communication exchange took less than 3-minutes, no further identification was required.

In a practical situation, the station is identified simply through the effort of being recognized by the other station. This complies with identification during the first transmission. However, under present regulations, the station is required to identify again during the last transmission. Unfortunately, the vast majority of stations are not complying with this portion of the regulations.

By reverting to the “3-minute” rule, what is now technically illegal operation by hundreds, and even thousands, of operators will again comply with regulations. Reinstating the “3-minute” rule will place absolutely no hardship on any operator yet will legalize what is now common practice.

A proposed rewording of 97.119(a) is as follows:

(a) Each amateur station, except a space station or telecommand station, at the end of each communication, and at least every 10 minutes during a communication, for the purpose of clearly making the source of the transmissions from the station known to those receiving the transmissions. No station may transmit unidentified communications or signals, or transmit as the station call sign, any call sign not authorized to the station.

(1) If identification is made during the first transmission and when the total communication is less than 3-minutes, the transmitting of its assigned call sign at the end of the communication may be omitted except as provided for in Section 97.115(d).

The purpose of these proposed changes is to simplify the identification regulations as well as to legalize what is now common practice.

Respectfully submitted

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