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

Gentlemen:

Attached is a petition to change the rules for identification of stations in the Amateur Radio Service as contained within 47 CFR Part 97 Section 97.119(a). Several years ago I submitted a more complex change basically reverting to the language contained in the regulations a number of years ago. This petition was originally opposed by the American Radio Relay League because representatives of that organization did not understand the reasoning for reverting to the old procedures for identification. After discussions with the ARRL they did alter their position. Unfortunately, by that time, the comment period on the NPRM had expired and numerous individuals had been influenced by the ARRL's initial opposition and had made official comments opposing the suggested changes. The result was a denying of the petition.

The petition accompanying this letter is considerably different from the one submitted several years ago. Basically, the suggested changes in the identification procedures for the Amateur Radio Service only serve to legalize what has been common practice for decades. The present regulations require the identification of the amateur radio station at the end of communications with a particular station no matter how long that communication takes. This practice is, unfortunately, not being followed by the vast number of stations when working "DX" (stations located in countries other than the United States) and during contest operations which involve contacting as many stations as possible within a specific time frame. Virtually every amateur station does NOT identify at the end of the communication.

When what was known as the "3-minute rule" was in effect, the operator was required to identify the station during the first transmission of the communication but, if the length of the total communication lasted for less than 3-minutes, no further identification was required. When attempting to be recognized by the "other" station, the operator routinely gives his/her call sign repeatedly. This definitely satisfies the requirement to identify during the first transmission of the communication. Since virtually all communications made when working "DX" and in contests are of very short duration

(often for only a few seconds), the return of the “3-minute” rule would definitely satisfy the elimination of the station call sign at the end of the communication.

Even when not involved in working “DX” or in contests, most amateur radio operators identify during the first transmission. As such, no additional burden would be placed on those operators. However, with the reinstatement of the “3-minute rule”, what has been common procedure for many amateur radio operators, would again be legal.

The proposed changes in Section 97.119(a) only require that the call sign of the station must be made during the first transmission (which is routinely made by most operators) and the reinstatement of the “3-minute rule”. No other changes are made to the current regulations. As such, the adopting of the reinstatement of the “3-minute rule” would greatly benefit the adherence to the regulations while having no effect on the operating habits of those operators in the Amateur Radio Service.

Respectfully submitted:

Glen E. Zook, K9STH

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

Submitted by

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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, must transmit its assigned call sign on its transmitting channel at the beginning of each communication, 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) 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).

Stating the requirement of identifying at the beginning of the communication also eliminates any question of “unidentified” communications. Again, most operators do identify during the first transmission and formalizing this action places no burden on any operator.

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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