ARRL Will File Comments in Opposition to FCC Application Fees Proposal

ARRL wants to assure members that it is aware of, and will be filing comments to oppose, a recent FCC proposal that would require amateur radio licensees to pay $50 for each amateur radio license application (including renewals and upgrades) and vanity call sign request. Applications for administrative updates, such as changes of address, would be exempt from the new fee schedule.

The FCC proposal is contained in a *Notice of Proposed Rulemaking* ([*NPRM*](https://docs.fcc.gov/public/attachments/FCC-20-116A1.pdf)) in MD Docket 20-270, which was adopted to implement portions of the “Repack Airwaves Yielding Better Access for Users of Modern Services Act” of 2018 — the so-called “[Ray Baum’s Act](https://www.congress.gov/115/plaws/publ141/PLAW-115publ141.pdf).”

The proposal does not specifically target the Amateur Radio Service. The new fee schedule and proposed fees impact every industry overseen by the FCC, including applications, modifications, and renewals of wireless, television, and satellite licenses, applications to participate in auctions to tariff filings, formal complaints, and even to certain petitions. The 2018 law requires that the FCC switch from a Congressionally mandated fee structure to a cost-based system of assessment. The *NPRM* proposes application fees for a broad range of services that use the FCC’s Universal Licensing System (ULS) -- including the Amateur Radio Service -- that had been excluded by an earlier statute (the 2018 statute excludes the Amateur Service from annual regulatory fees, but not from application fees).

Pages 9 – 10 of the *NPRM* address amateur radio and other personal radio services. Deadlines for comments and reply comments will be determined once the *NPRM* appears in the *Federal Register*. This proceeding is already open to accept comments, however, even though deadlines have not yet been set. Interested parties may file comments by using the FCC’s Electronic Comment Filing System ([**ECFS**](https://www.fcc.gov/ecfs/filings)), posting to MD Docket No. 20-270.