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Marlene H. Dortch, Secretary
Federal Communications Commission
45 L St. NE
Washington, DC 20554

Re: **WT Docket No. 21-2**
Wireless Telecommunications Bureau Seeks Input on Expanding the
Number of Amateur Operator License Volunteer Examiner Coordinators

The American Radio Relay League, Inc., also known as the ARRL, The National Association for Amateur Radio (“ARRL” or “League”), submits these comments in response to the above-captioned Public Notice (“Notice”) seeking input on possible expansion of the number of Volunteer Examiner Coordinators (“VECs”) authorized by the Commission.¹

For the reasons discussed below, the League has concluded that except for a brief two months during the onset of the COVID-19 pandemic, examination opportunities have been and continue to be plentiful throughout the United States;² that adding VECs would have no effect on the number of examination opportunities or available examiners since it is VEs, not VECs, that administer examinations and fourteen separate and independent VECs already accredit VEs for this purpose; and that increasing the number of individual VECs beyond the existing fourteen would increase the complexities of uniform management through the National Conference of VECs (“NCVEC”) and also increase opportunities for abuse and fraud with no countervailing benefit.

Expanded Amateur Operator Examination Opportunities

Amateur operator examinations are more available today than even before the pandemic. VECs and VEs together have worked to add web-based (“remote”) examination opportunities to traditional on-site examinations. Remote examinations are, by their nature, without geographic

¹ See FCC Public Notice DA 21-9 released January 5, 2021.

² The actual FCC licensing figures, which represent examinations successfully completed, are set forth *infra* page 4.

boundary. The only limiting factor is that participants must have access to sufficient Internet connections. Incorporating this technology as the pandemic shut down traditional on-site examinations expanded examination opportunities and effectively made examinations readily available nationwide.

In addition, in November examination opportunities were uniformly expanded to Spanish-speakers. Standardized Spanish language operator examinations make amateur radio licensing more accessible than ever to a significant population in the United States.

In response to the Commission's Notice, ARRL reviewed the amateur examination numbers for the past 5 years, including the COVID-19 pandemic period. We found that even though ten of the twelve months for calendar year 2020 were times of severe disruption throughout the nation, including for FCC and ARRL headquarters staff, amateur examination opportunities and numbers were strong. Multiple web-based examination opportunities were available anywhere in the nation, even on short notice, and in-person examinations were available in many areas where permitted by local regulation and subject to special safety requirements. The number of FCC-issued new and upgraded licenses is in line with earlier years, with noticeable increases in the four months following the lock down that occurred in many areas in the early spring.

Specifically, since April 2020, several thousand VEs have trained to conduct video-supervised online examinations using a video platform and the ExamTools online examination system. Approximately forty ARRL-coordinated teams of at least 3 VEs each have been administering video exams on a weekly and monthly basis. Some teams offer testing multiple times a day. Although first introduced as a regular examination method during the pandemic in 2020, by the end of the year VECs had coordinated over 10,000 remote examinations representing 31% of all exams administered during the year.

On-site examination opportunities have also re-bounded after being reconfigured to comply with a variety of local and state health regulations during the pandemic. The ingenuity of the local VEs has been noteworthy, such as conducting "drive-in" examinations while maintaining close observation to protect the integrity of the examination.

Anyone desiring to schedule an amateur examination merely has to check a schedule of examinations on the Web and contact the VE team offering an exam on the desired day and time, whether virtual or on-site. It has never been easier. Often exams are available within 48 hours, but rarely more than 7 days later if using a remote (virtual) web-based examination opportunity.

Amateur Examination Facts and Figures

Individual amateur operator volunteer examiners ("VEs") are responsible for administering amateur examinations, not VECs. Consistent with the program's statutory authorization, the Commission's implementing rules, and the governing Memorandum of Understanding between the Commission and the ARRL, the ARRL trains and accredits interested and qualified amateur licensees to administer exams. In addition to the activities of the ARRL VEC, the additional thirteen FCC-appointed amateur VECs similarly accredit VEs

and coordinate amateur examinations. All fourteen VECs voluntarily cooperate through the National Conference of Volunteer Examiner Coordinators (“NCVEC”).³

The ARRL VEC alone currently has more than 30,000 accredited VEs located throughout the country, 11,000 of which regularly participate in activities on a weekly or monthly basis. VE applicants are trained and accredited without regard to membership (or lack thereof) in any amateur radio organization, including the ARRL itself. The other thirteen VECs have accredited additional thousands of VEs. Growing the Amateur Service benefits all. Some of the more active VEs even obtain accreditation from multiple VECs to facilitate forming 3-person exam groups anywhere that an exam may be needed. Lists of exam opportunities are published on the Internet and available to everyone.⁴

Since it is individual VEs – not VECs – that administer the examinations, and accreditation for this purpose is available from multiple VECs to qualified amateur radio licensees, increasing the number of VECs would not serve to increase the availability of amateur radio examinations. As it stands today, qualified licensees can choose from among multiple VECs to gain accreditation and become associated with others to give examinations. With fourteen VECs already cooperating through the National VEC, increasing the number of VECs would only complicate the necessary coordination among the VECs to agree on the examination question pools and to weed out the inevitable few dishonest “bad apples” that periodically appear.

Our review of recent examination data for 2020 and our comparison of the figures to the immediately preceding 5 years concluded that despite the unprecedented pandemic:

- the number of examinations administered by volunteers was comparable to the number in previous years;
- volunteers had been very resourceful in conducting safe in-person examinations consistent with local laws and regulations;
- a significant shift to on-line examination opportunities resulted in examination opportunities being readily available anywhere in the nation wherever an examinee has access to sufficient Internet connectivity;
- on-line opportunities have increased the availability of examination opportunities throughout the nation; and
- the pool of potential examinees has been expanded by the availability of Spanish-language examinations.

³ See <http://www.ncvec.org/>.

⁴ One popular site listing amateur exam opportunities is here: <https://hamstudy.org/sessions>. As of February 4, for example, there are multiple on-line examinations available to “anyone anywhere” as early as two days later, February 6. There also are on-site opportunities available in multiple states. ARRL’s “find an exam” page provides additional resources and lists 2,507 future examination opportunities, see: <http://www.arrl.org/exam>.

Despite the difficult circumstances of the pandemic in 2020, there was no discernible decrease in examinations administered as determined by the resulting new and upgraded licenses issued by the Commission. (Of course, the FCC numbers do not include all the examinations that are administered but not passed.) We note in particular that in four consecutive months immediately after widespread closures due to the pandemic, June through September, more new amateur licenses were issued in 2020 after examination than in the same months during any of the preceding five years. Similarly, for four months, July-October, more licensees upgraded their licenses through examination than in those months during each of the preceding five years. The numbers for January, 2021, are even higher compared to the same month in earlier years.

FCC STATS - ALL VECs

NEW FCC LICENSES ISSUED JANUARY, 2016 THROUGH JANUARY, 2021						
Year	2016	2017	2018	2019	2020	2021
Jan	1,792	2,027	2,031	1,874	2,058	2,838
Feb	3,328	3,008	3,171	2,931	2,943	
Mar	4,080	3,811	3,457	3,189	2,475	
Apr	3,041	2,686	3,258	2,849	801	
May	3,345	2,742	3,413	2,663	1,758	
Jun	2,504	2,530	3,022	2,287	3,238	
Jul	2,357	1,944	2,175	2,154	2,576	
Aug	2,387	2,388	1,980	2,355	2,866	
Sep	2,222	1,931	1,866	2,062	3,213	
Oct	2,292	3,204	2,598	2,815	3,046	
Nov	2,822	3,398	2,646	2,904	2,629	
Dec	2,382	2,527	1,959	1,929	2,308	
Totals	32,552	32,196	31,576	30,012	29,911	2,838

UPGRADED FCC LICENSES ISSUED JANUARY, 2016 THROUGH JANUARY, 2021						
Year	2016	2017	2018	2019	2020	2021
Jan	604	644	717	577	554	920
Feb	906	773	825	957	817	
Mar	1,151	1,117	1,065	1,036	643	
Apr	1,101	922	724	1,070	207	
May	1,327	957	1,009	1,132	502	
Jun	1,331	831	862	1,053	1,148	
Jul	844	614	734	676	1,113	
Aug	752	762	760	598	777	
Sep	677	589	616	583	878	
Oct	612	728	768	704	929	
Nov	675	881	733	824	833	
Dec	637	758	643	554	754	
Totals	10,617	9,576	9,456	9,764	9,155	920

Integrity of the Examination Process

The current VECs are experienced, and individuals pass this experience on to successors within each organization. This has proven critical to maintaining the integrity of the volunteer-administered examination process. Experienced VECs can and do spot irregularities in test session reports that others might not notice. While we all wish that such vigilance was not necessary, unfortunately it is a fact of life in amateur operator testing as elsewhere. Simply put, more VECs will do nothing to increase the number of VEs who administer the examinations in teams since each VEC is readily appointing qualified licensees who volunteer wherever needed. But adding VECs inevitably will increase the potential for fraud and abuse.

Instead of increasing the number of VECs, we would encourage volunteers to become accredited as VEs and to volunteer to help the current VECs wherever possible. Many of the VECs would welcome help.

Conclusion

In response to the Commission's Notice, the ARRL reviewed the amateur licensing statistics for the past 5 years, including the COVID-19 pandemic period. We found that even though ten of the twelve months for calendar year 2020 were times of severe disruption throughout the nation, amateur operator examination opportunities and licenses were comparable to those of the preceding years. New and upgraded licenses issued in January 2021 far exceeded earlier years and were handled without strain by the existing VECs and VEs.

Multiple web-based examination opportunities now are available anywhere in the nation, even on short notice, and in-person examinations are available in many areas where permitted by local regulation subject to health safety requirements. In addition, notwithstanding the added demands of dealing with the pandemic, a standardized question pool in the Spanish language has been implemented that also expanded operator examination opportunities.

The Commission created VECs to better manage its own resources and to limit the demands of directly interfacing with many different organizations. Adding VECs would increase the demands upon the Commission in this regard while not affecting the aggregate number of examination opportunities or available examiners since it is VEs, not VECs, that administer examinations and examination opportunities exceed demand.

The fourteen separate and independent FCC-approved VECs readily accredit additional VEs whenever and wherever needed. Increasing the number of individual VECs would have no discernible benefit. What increasing the number would do is increase the complexity of VEC coordination and management through the voluntary NCVEC, increase demand upon the FCC's resources to interface with additional organizations, and increase opportunities for abuse and fraud.

Respectfully submitted,

A handwritten signature in blue ink that reads "DR Siddall". The initials "DR" are written in a stylized, cursive font, followed by the name "Siddall" in a similar cursive style.

David R. Siddall
Washington Counsel
ARRL, THE NATIONAL ASSOCIATION
FOR AMATEUR RADIO