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Official Observers: Something's Coming

“OOs are among our most dedicated and conscientious volunteers. Also, today, among our most frustrated. The most frustrating part of being an OO is serving up carefully documented violations that don't result in actions. We're aiming to change that with the first overhaul in 2 decades.”

The ARRL Official Observer program has been a part of our community for more than 85 years. It was created to assist amateur operators in maintaining the quality of their signals, and in promoting good operating practices. Recall that the impetus always has been prescriptive and ameliorating. All of this with a view to correcting non-compliance before it comes to the attention of the regulators, notably the FCC. Almost 2 decades have passed since the OO program has been subject to any comprehensive review by ARRL Headquarters staff.

In the interim, much has changed.

Regulatory policy and practice, along with its enforcement, has evolved dramatically over the same 20-year span. Much of the evolution has been driven by the fact of there being fewer resources at the FCC. Field offices across the country have closed, and many of the experienced FCC staffers who manned those offices have departed. The remaining commission staffers have been required to do more with fewer resources. Enforcement priorities have changed. Shifting priorities, combined with the increasing pressure of diminished resources, have changed the way that the FCC monitors, investigates, and pursues, where warranted, violators across the entire spectrum, not just the Amateur Radio bands. And for the FCC, violations arise not only from operation of licensed equipment, but also from growth of non-compliant passive devices, like lighting.

It's important to bear in mind that the principal end-user of all Official Observer activity is the FCC. The Commission, as our client, alone must determine which violations it chooses to pursue (enforcement policy), and which violations it will deemphasize in favor of accomplishing higher priorities. The OO program strives to harmonize its activities with enforcement policies. This harmonization is aptly referred to as the *impedance match* between priorities. If matching isn't achieved, the considerable talents and efforts of Official Observers are dissipated, and the OO corps grows increasingly frustrated. OOs are among our most dedicated and conscientious volunteers. Also, today, among our most frustrated.

At ARRL, we are reviewing everything, with a view to improving that impedance match. Some of the questions we are asking include: What's working? What can be improved? How can the OO program most efficiently take up the slack left by reduced enforcement resources? What volume of field reports can the Commission reasonably be expected to process, ranging from warning letter, to notice of violation, all the way to notice of apparent liability? How can OO volunteers better collect, cata-

log, review, evaluate, and forward reports? The answers to all these questions, in addition to understanding enforcement priorities, will drive the future corps of OOs.

And what about the development of the future OO? Shouldn't we invest in him or her? Should accreditation be perpetual or renewable? What kind of continuing training and education will support the corps going forward? Today, a team of ARRL staffers led by a board vice president are wrestling with these and other issues under the supervision of the board's Executive Committee. Specific recommendations will flow up to the board's Programs & Services Committee (PSC), to the board's Administration & Finance Committee for financial and staffing requirements, and finally to the board of directors. Only after board approval will any major change to the Official Observer program be implemented. If you have felt a pause in routine activity, it's because the staff is currently focused on the above-mentioned tasks.

What to do while you're waiting? ARRL Second Vice President Brian Milesosky, N5ZGT, who leads our efforts, urged Section Managers to carry on in the meantime. "Keep an eye on the bands. Document blatant rule violations and report them up the chain," he wrote in a June e-mail. "Recognize good amateurs who are leading by example with 'Good Operator' notices. Provide friendly heads up and assistance to those who make unwitting mistakes." Brian's sentiment embodies the very core motivation for creating the OO program 85 years ago: be a mentor and avoid a problem later.

FCC Chairman Ajit Pai has made it clear where he stands on the topic of enforcement. In an appendix to the Jay Peralta case in New York, and while imposing an assessment of more than \$400,000, he stated, "Today, the FCC makes it abundantly clear that it will not tolerate unauthorized and illegal use of the radio spectrum...the agency has had the important mission of preventing radio interference...and vigorous prosecution of the fight against unauthorized operators is an important way to do [it]." Let's be encouraged and take him at his word.

In the meantime, there's plenty of opportunity for thoughtful ideas and feedback from the Official Observer community and our community at large. Please send your comments directly to oo@arri.org. You all are on the front line here. Let's hear from you.