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

Subject: Petition for Proposed changes in 47 CFR Part 97 Section 97.119

Commissioners:

Over the past several decades the Commission has, in various stages, tried to simplify the rules and regulations concerning the Amateur Radio Service as encompassed in 47 CFR Part 97. In general, these simplifications of the rules have not caused any major problems with the exception of the requirements for the identification of the individual station by the control operator.

47 CFR Part 97 Section 97.119 paragraph (a) reads as follows:

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.

This section continues with specific regulations concerning all sorts of circumstances, emissions, and so forth. The portions of 97.119 following paragraph (a) (paragraphs (b) through (g) inclusive) are concise and are not the source of problems in the identification process.

The provision in paragraph 97.119 (a) which state "No station may transmit unidentified communications or signals" specifically indicates that sometime during the initial transmission by an amateur radio station (unless that transmission is in excess of 10 minutes in length which requires identification to be given at the 10 minute point) the call sign of the station must be given. If the call sign is not given during the first transmission then the station has, by

WTB-06-23

definition, made an "unidentified" transmission that is contrary to the provisions of 97.119 (a).

Unfortunately, too many amateur radio operators, especially when operating utilizing FM repeaters, do not identify during their first transmission. In fact, a considerable number of these operators never seem to get around to identifying even after 10 minutes of operation and a "fair" number never seem to get around to giving their call sign at all. Many of these operators believe that the other stations in which they are in communications "know the sound of their voice" and that is sufficient for identification. The result is that there is definitely confusion as to which station is transmitting at what time.

When stations are communicating using methods other than FM repeaters, especially on frequencies below 30 MHz, propagation is such that it is possible for the signal to "skip" to another area of the country in a very short period of time and the identification of the station not to be known. This situation requires a more stringent need for station identification.

In years past the identification procedures required by the Federal Communications Commission were "spelled out" in relatively concise terms that did not allow for "interpretation" as to just what was an identified transmission and what was an unidentified transmission. For example, for many years, the Commission's regulations were basically like those that were included in Part 12 which was the section of the regulations that concerned the Amateur Radio Service at the time.

12.82. Transmissions of call signs. (a)

(1) The operator of an amateur station shall transmit the call sign of the station or stations (or may transmit generally accepted identification of the network) being called or communicated with, or shall identify appropriately any other purpose of a transmission, followed by the authorized call sign of the station transmitting:

(i) at the beginning and end of each single transmission or;

(ii) at the beginning and end of a series of transmissions between stations having established communications, each transmission of which is of less than three minutes duration (the identification at the end of such a series may be omitted when the duration of the entire series is less than three minutes), and;

(iii) at least once every ten minutes or as soon thereafter as possible during a series of transmission between stations having established communications, and;

(iv) at least once every ten minutes during any single transmission of more than ten minutes' duration.

(2) The required identification shall be transmitted on the frequency or frequencies employed at the time . . .

(b) When telephony is used the call sign of the station shall be preceded by the words "this is" or the word "from."

(d) When using telephony, phonetic aids to identify the call sign of the station may be employed.

There are other portions of this segment that are similar to those provisions of 97.119 (b) through (g) and are not relevant to this petition.

Because of the confusion in the regulations concerning the correct identification procedures as presently expressed in 97.119 (a) it is proposed that 97.119 (a) be rewritten as follows:

97.119 Station identification.

(a) Transmissions of call signs.

(1) The operator of an amateur station shall transmit the call sign of the station or stations (or may transmit generally accepted identification of the network) being called or communicated with, or shall identify appropriately any other purpose of a transmission (i.e. "test"), followed by the authorized call sign of the station transmitting:

(i) at the beginning and end of each single transmission or;

(ii) at the beginning and end of a series of transmissions between stations having established communications, each transmission of which is of less than three minutes duration (the identification at the end of such a series may be omitted when the duration of the entire series is less than three minutes), and;

(iii) at least once every ten minutes or as soon thereafter as possible during a series of transmission between stations having established communications, and;

(iv) at least once every ten minutes during any single transmission of more than ten minutes' duration.

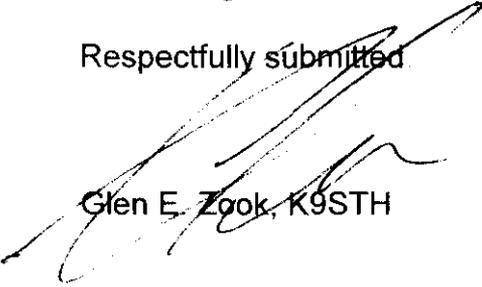
(v) when telephony is used the call sign of the station shall be preceded by the words "this is" or the word "from."

(vi) when CW is used the call sign of the station shall be preceded by the prosign "de" (meaning "from").

(vii) when other modes of communications are employed the appropriate designation which implies the word "from" or "this is" may be employed.

The purpose of this request for changes in 47 CFR Part 97 Section 97.119 is to clarify the existing regulations and to help eliminate problems with station identification in the Amateur Radio Service. The suggested rewording of Section 97.119 (a) represents a minor, but important, change in the regulations concerning the Amateur Radio Service.

Respectfully submitted,



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