

### Preparing Your Written Comments (See second page for **Steps to Submit an Online Filing**)

ARRL will file comments with the FCC opposing their proposal to adopt a \$50 fee for each Amateur Radio License application. The fee would apply to applications for new licenses, renewal and upgrades to existing licenses, and vanity call sign requests.

**ARRL members are urged to file individual comments.** The deadline to make your voice heard is November 16, 2020. The reply comment deadline — that is, the deadline for comments on comments already filed — is November 30. **Use this guide to help you prepare and submit your written comments to the FCC.** Remember to include your name and address within the document and save it with a filename and location on your computer where you can find it. When you are ready to file your comments with the FCC, use the step-by-step instructions on the second page of this guide.

For further information, visit <http://www.arrl.org/FCC-Fees-Proposal>.

Here are some points that can be used when preparing your written comments opposing the FCC proposal.

#### **Public Service**

Amateurs contribute to the public good. In many areas they provide an emergency communications backbone capability at no taxpayer cost. Consistently we have witnessed storms and natural disasters completely wipe out internet, cellular, and other means of communication. Radio amateurs often fill that void on an unmatched, flexible basis when needed. Recent examples of Amateur Radio Service readiness and response include the California wildfires and Gulf Coast hurricanes.

#### **A Voluntary, Non-Commercial National Resource**

Unlike operators in other FCC licensed services, Amateur Radio Service operators by law — domestic and international — must not use their license for any pecuniary interest. Radio amateurs are prohibited from earning or charging any money for any communications activity. The expenses for their equipment, training, and other activities come out of their own pockets, with no opportunity for reimbursement or payment of any kind.

#### **Technology**

Amateur radio is a source of significant technological innovation that should be encouraged, not discouraged.

#### **Youth and Education**

The United States is experiencing a severe lack of RF engineers and expertise at the very time it is needed by the rapidly growing wireless industries. Amateur radio is helping to meet the deficit, but much more is needed and youngsters (High School and College-aged) are least able to afford licensing fees. RF knowledge and related digital expertise is needed to maintain US leadership in wireless industries. At a minimum, young people (below the age of 26) should be exempt from the proposed license fees.

#### **Self-Regulating**

Amateur radio is self-regulating: (a) Amateur examinations are written and administered by radio amateur volunteers. (b) Examination results and paperwork most often are submitted electronically to the FCC. Electronic submission could be required if there would be a cost savings to the Commission. (c) Amateur radio educational classes are conducted by volunteers who by and large do not charge fees or tuition for teaching. (d) The Amateur Service, in cooperation with the FCC's Enforcement Bureau, has a volunteer corps that monitors the amateur airwaves and has programs that work to prevent their misuse before FCC involvement might be needed. These amateurs also observe non-amateur signals both within amateur spectrum and outside it, and report unusual or suspicious signals.

#### **Additional Suggestions**

- Focus on the positive aspects and value that the Amateur Radio Service offers our nation.
- Avoid arguing that the fee will “kill” amateur radio. Rather, make pertinent arguments on why the fees would impair the public benefits of the Amateur Radio Service.
- Avoid ham jargon (QSO, worked, ticket, bird) in your comments, which will not be understood by FCC personnel administering this proposal. The fee proposals cover every FCC license and service across the board and the consideration was directed by Congress.

### Steps to Submit an Online Filing (See first page for **Preparing Your Written Comments**)

- 1** Prepare a document (PDF is strongly recommended, but the system will accept doc, docx, and some other file formats). Include your name and address within the document and save it with a filename and location on your computer where you can find it. When you're ready to file your comments, go to the FCC filings form from an internet browser on a computer or other online device:  
<https://www.fcc.gov/ecfs/filings>  
Or, use the FCC Express Comment form to file short, typed-in comments (no document upload) at:  
<https://www.fcc.gov/ecfs/filings/express>
- 2** Select the first text box labeled **Proceeding(s)**. Type in **20-270**. This is the filing number. Be sure the pop-up box displays the title of the correct proceeding, and select it or press the ENTER (or Return) key. Once you've done this, 20-270 will be highlighted in yellow.
- 3** Select the box labeled **Name(s) of Filer(s)**. Type your full name and then press the ENTER key. You will need to press ENTER after you've typed it in. Once you've done this, your name will be highlighted in yellow.
- 4** Skip the boxes labeled "Law Firm" and "Attorney" (unless applicable). Select the box labeled **Primary Contact Email** and type your email address. This box will NOT get highlighted. The filer's email address will not be made public by inserting it here. However, any information you include in your comments, including an email address, will be made public.
- 5** Select the box labeled **Type of Filing** and select "Comment" from the dropdown items. It is the first item.
- 6** Skip the boxes labeled "Report Number," "Bureau ID," and "File Number."
- 7** Move down the list of boxes to **Address of** and select "Filer" from the dropdown items, as you are the filer of this comment. Then, type your address in the boxes labeled **Address, City, State** (select from dropdown), and **ZIP**.
- 8** Move to the **Upload Documents** box to upload your pre-written comments. By clicking on the hyperlink inside the box, you will be prompted to upload the document you saved with your comments. Go to the file folder and select the document. Then hit "Open" to upload the document into the FCC system. If you've done it correctly, it should now show the name of the document in blue below the Upload Documents area.
- 9** Click on the small **Email Confirmation** checkbox so that you'll get a confirmation of your submission. Then click on the blue **Continue to review screen**. This will allow you to review all the submitted information before you hit the Submit button. If you are satisfied with your entries, select the **Submit** button. If not, use the BACK button on your browser to return to the entry page and make any corrections or changes, then continue again to the review screen and submit.
- 10** There is a delay before your comments will appear on the FCC website. However, if you receive the email confirmation — usually within minutes — the comment has been successfully filed.  
Congratulations! You're done and can exit from the web page.