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# Permanent Exam Credit?

*“There was a time when in order to renew an Amateur Radio license it was necessary to submit evidence of recent activity, such as an extract from your station log, to the FCC. Operator and station licenses were two different things; you could renew your operator license on the basis of operating someone else’s station but you had to operate your own station in order to renew your station license. Eventually the requirement to submit evidence was deleted from the rules but the activity requirement lingered until the mid-1970s when it, too, was dropped.”*

Times have changed. The license term in those days was five years; now it’s ten. Today the FCC treats operator and primary station licenses as inseparable; you can’t have one without the other. The only requirement to renew a license is to remember to do so before the two-year grace period expires. Thus the only difference between two people licensed more than 12 years ago, one of whom is still licensed while the other is not, is that the first person went through an administrative procedure proving nothing more than that they were still alive and paying attention.

With that in mind the FCC responded favorably to a petition filed in April 2011 by the Anchorage Volunteer Examiner Coordinator to grant examination credit for any exam elements ever passed by former licensees, rather than requiring them to retest. In a Notice of Proposed Rule Making (NPRM) released on October 2 (WT Docket No. 12-283) the Commission solicited public comment on this and several other proposed changes to its rules. A summary of the proposals is on page 64 of this issue of QST.

The proposal is similar to one made by the ARRL in 1994. The Communications Act limits the term of a station license to ten years but there is no such limit on an operator license, which the FCC could grant for the lifetime of the operator. At that time the ARRL proposed that the FCC extend all currently held operator licenses to lifetime. This would have allowed anyone then holding an amateur license to apply for a new station license in the future without having to retest. It was clean, simple, and easy to implement.

But the FCC thought it had a better idea and proposed instead to grant examination credit for expired licenses. This proposal, in WT Docket No. 95-57, attracted more negative than positive comments and in 1997 the Commission decided against adopting its own proposal. The Commission offered this explanation for why it did not opt for the lifetime operator license: “[T]he operator would still have to renew the station license every ten years. We would therefore, have to develop and maintain a separate data base specifically for the purpose of maintaining indefinitely records of amateur operators who allow their station license to expire. It would not be in the public interest to expend resources for such increased record retention.” If you find that explanation to be less than persuasive you’re not alone. Be that as it may, neither approach was adopted to ease the path of re-entry into Amateur Radio for former licensees.

In resurrecting its earlier proposal in response to the Anchorage VEC petition the FCC stopped short of enthusiastically embracing the idea. By footnote it even referenced the arguments against it that had been made more than 15 years ago: “In view of the opposition expressed in the comments,

we decline to adopt our proposal to give examination credit for licenses formerly held. Persons who allow their amateur operator license to expire will have to pass the requisite examinations if they later decide to obtain another amateur operator license. We do not believe that attending an examination session is a hardship. The VEs provide abundant examination opportunities. They must, moreover, accommodate an examinee whose physical disabilities require a special examination procedure, including administering examinations in the home.

“We believe that our procedures provide ample notification and opportunity for license renewal. The license expiration date is shown on our licensee data base, so that it can be obtained through the Internet even if the license document is lost. Providers in the private sector often use this information to remind licensees that expiration is about to occur. For those persons who inadvertently fail to renew, a two-year grace period is allowed. At the conclusion of the grace period, the record of the former licensee is purged from the data base and the call sign becomes available for reassignment in the vanity call sign system. Further, we have made the license renewal process as simple as possible by expanding our electronic filing procedures to include license renewal.”

While the Commission did not choose to cite it, in 1995 the ARRL had offered another argument against giving examination credit for licenses formerly held: it would impose a new responsibility and burden on Volunteer Examiners. While the current Commission proposal is to *require* that VEs give examination credit to an applicant who can demonstrate that he or she formerly held a particular class of license, the Commission notes the potential for fraud by an applicant who produces evidence of a license previously held by a different person with the same name. Is it fair to force VEs to make decisions about the authenticity of documents that may be older than the VEs themselves?

This is but one of several proposals contained in the NPRM, the full text of which is available at <http://apps.fcc.gov/ecfs/document/view?id=7022026747>. Review the proposals and submit comments if you wish. Whether or not you comment directly to the FCC, please share your thoughts with your ARRL Director. At this time the Board of Directors has not adopted any positions with regard to the proposals contained in the NPRM, except of course with regard to the TDMA proposal made by the ARRL itself. If you want to influence ARRL policy, now’s the time!