

Before the
FEDERAL COMMUNICATIONS COMMISSION
445 12th Street, SW
Washington, D.C. 20554

In the Matter of:)
)
 Establishing a new Volunteer Examiner)
 Coordinator per 47 CFR § 97.521)
)
 Relating to the Amateur Radio Service)

PETITION TO ESTABLISH A NEW VOLUNTEER EXAMINER COORDINATOR

filed September 14th, 2020 by
Aurora Amateur Radio Group – WL9Z
Kodiak, Alaska

I. Introduction

Pursuant to 47 CFR § 97.521 of the rules of the Federal Communications Commission (hereinafter referred to as “FCC” or “Commission”), the Aurora Amateur Radio Group, call sign WL9Z of Kodiak, Alaska (hereinafter referred to as “AARG” or “Aurora Amateur Radio Group”) respectfully petitions the Federal Communications Commission, Wireless Telecommunications Bureau to authorize the establishment of a new Volunteer Examiner Coordinator (hereinafter referred to as “VEC”) to coordinate and administer amateur radio license examinations in any location under governance of the Commission’s rules [Ref. Appendix 1, 47 CFR, Part 97].

In late 1982, the Goldwater-Wirth Bill was passed by Congress and signed into law by President Ronald Reagan. This bill, Public Law 97-259, amended the Communications Act of 1934, which permitted the Commission to accept the voluntary and uncompensated services of licensed radio amateurs to serve in preparing and administering amateur radio license examinations. It also gave birth to the Volunteer Examiner Coordinator (VEC) program in 1984. This allowed Volunteer Examiner Coordinators (VECs) to be formed with the purpose to oversee the work of their certified Volunteer Examiners (VEs) and serve as a liaison between the VEs and the Commission.

II. Statement of Law

As outlined in 47 CFR § 97.521, a written agreement must be established with the Commission prior to serving as a VEC. We further attest, per Subsection 97.521 the following shall explicitly apply to receive FCC approval as an independent VEC program:

- (a) Be an organization that exists for the purpose of furthering the amateur service;
- (b) Be capable of serving as a VEC in at least the VEC region proposed [Ref. 47 CFR, Part 97, Appendix 2];
- (c) Agree to coordinate examinations for any class of amateur operator license;
- (d) Agree to assure that, for any examination, every examinee qualified under these rules is registered without regard to race, sex, religion, national origin or membership (or lack thereof) in any amateur service organization;

The Aurora Amateur Radio Group affirms this to be true and correct.

III. Justification for the Filing of a Petition to establish a new VEC

We are at a pivotal time in our nation's history in regard to amateur radio license testing. Considering that the Commission has recently gone "paperless" for issuing licenses [Ref. FCC Public Notice WT Docket No. 14-161], the demand for constructive and positive change in the way exams are administered is a pressing issue. During this time, we need to be open to new ways of implementing and allowing individuals access to amateur radio license examinations, therefore allowing citizens the opportunity to give back to their community through public service.

It is our desire to see this through by showing the amateur radio service in our country a more technologically sound way to help maintain the Commission's vision of remaining paperless as much as conceivably possible. Our hope is to be given an opportunity to make history by establishing a new VEC in these uncertain times with an abundance of options for applicants to take their examinations, regardless of physical location. Therefore, we will aim to be a nationwide VEC covering all fifty States, Territories and other Possessions of the United States. We will always provide unconditional support to our men and women deployed globally in the United States Armed Forces.

The Commission has not entered into any agreement with an organization seeking to establish a VEC for more than thirty years. If our request is granted, the Aurora Amateur Radio Group stands more than ready to implement, innovate and pioneer the most progressive examination system for the amateur radio service. Within

the past few years, America's demand for reliable, high speed internet has grown. The Commission has clearly expressed their desire to bridge the digital divide by supporting development of more advanced methods to bring internet connectivity to our country's rural population [Ref. 17-182; DA-18-887]. It is through this initiative that amateur radio license examinations have become more accessible to anyone in the United States with internet connectivity. Remote, web based examinations for amateur radio licenses have been a tremendous asset in recent months. This will continue to be standard operating procedure with many VEC programs going forward, despite future challenges. The COVID-19 pandemic is just one example of why modernized exam procedures and practices should have already been implemented.

IV. Steps taken by the AARG to prepare for a new VEC

At this particular time, the Aurora Amateur Radio Group has already established our written policies relating to the new VEC. We have also established working relationships with volunteer software developers to bring 21st century technology into focus by implementing the latest programming techniques following the Free and Open Source concept. The Aurora Amateur Radio Group has secured a means to remotely deliver examinations to applicants anywhere in America, even with poor or insufficient bandwidth. We now have a very solid application that allows us to generate batch files for both individual and amateur radio club licenses, following the guidelines prescribed by the EBF user guide.

V. Facts and Arguments in Support of this Petition to Establish a new VEC

Some would argue that another VEC is unnecessary, or perhaps unjustified. We strongly disagree. To be successful in an environment of rapid technological advancement, a group of progressive and forward thinking individuals must lead a charge that allows for flexibility and adaptability in our methods to bring newcomers into the amateur radio service. This starts through a modern approach to exam delivery. Most VECs have been slow to implement an all-electronic exam platform. In fact, very few have plans to implement a decentralized electronic exam platform using portable technology in an off-grid environment. Today, many VECs solely issue paper examinations. In many cases, this results in long wait times for licensure. We find this to be unacceptable, especially with electronic filing and web based grading being readily available.

The Aurora Amateur Radio Group has already laid the foundation to be a pioneer in this regard. As technology improves and becomes more deployable, our proposed VEC will proactively ensure the success of our VEs in the field. We will accomplish this by implementing exam delivery technology that has undergone thorough quality testing, refinement and continuous development. Our success will ultimately translate into new licensees joining the amateur radio family, a 21st century approach to exam delivery and cross-device compatibility. This will help to eliminate a huge stumbling block experienced by younger applicants who are interested in obtaining their license. Technology plays a pivotal role in getting young applicants licensed.

In addition to technologically driven options to deliver examinations, the Aurora Amateur Radio Group aims to reinforce a standard that is imperative in amateur radio. That standard is to uphold, maintain and display an unparalleled level of honesty and integrity in the examination process. We will stop at nothing to maintain this. We believe there is a need to truly secure the gateway into amateur radio through our commitment to serving in a volunteer capacity. We believe there is a need to assure future applicants of our personal commitment to professionalism and courtesy through our willingness to preserve one of the most highly respected volunteer services when we are called upon to help in any situation.

VI. Name of the Proposed VEC

The name of our proposed VEC shall be called the “Aurora VEC”. It will be under the auspices of the Aurora Amateur Radio Group, club call sign WL9Z based in Kodiak, Alaska. We shall operate as an independent VEC as outlined in this document.

VII. Purpose and Goals of the New VEC

Our fundamental purpose for this new VEC is as follows:

- (a) Establish an examination system that clearly reflects the latest technological advancements by implementing an all electronic means to administer the exam, in person and remotely and accommodate VE teams with paper examinations when absolutely necessary
- (b) Build relationships with amateur radio clubs, emergency operations centers and public service officials with the purpose of providing a streamlined means for applicants to receive their examination and license without delay, and

- (c) Enshrine a standard in the amateur radio service that clearly demonstrates an unprecedented level of honesty and integrity in the examination process, to further recruit and train a cadre of volunteer examiners that will carry this level of pride in their service.

Additionally, upon receiving approval from the Commission to coordinate and administer amateur radio license examinations as an independent VEC, written policy shall be established relating to the following procedures:

- (a) Recruiting, training and accrediting new Volunteer Examiners
- (b) Establishing new teams to conduct examinations within the VEC
- (c) Preparing, administering and processing amateur radio license examinations
- (d) Screening, approving and forwarding successful applicants to the FCC for further processing and issuance of amateur radio licenses
- (e) Maintaining records of volunteer examiner applications, actively accredited volunteer examiners, session records and other pertinent data relating to VEC policies and practices, and
- (f) Ensuring that remote examinations are to be permitted with the use of a qualified proctor that shall be physically present during the examination, or using specific technological requirements to administer an examination without the need of a proctor being present.

We will continue to administer all three elements currently being offered at this time. The Aurora VEC shall be responsible for administering and preparing examinations for licenses in the amateur radio service. Moreover, the new VEC shall secure a means to collect pertinent data required for license grants to be issued by means of requisite forms. We will also continue to collect relevant data that relates to exam sessions itself, including but not limited to, exam answer sheets or electronic files and necessary information to complete batch files for Electronic Batch Filing processing and statistical purposes. All of this documentation will be secured electronically using

data encryption for the minimum 15 month retention requirement as required by the Commission [Ref. 47 CFR § 97.519(b)(3)].

Our goal, our request, is to administer exams adequately, effectively and safely using best practices, regardless of their physical location under any circumstances. We hope to be a model for VE groups nationwide and will continue to invite them to build upon an all-inclusive foundation to modernize the way amateur radio exams are administered. This is a positive, forward thinking reflection on the Commission's purpose to effectively govern communications in the United States. Under no circumstances shall the new VEC operate in a way that deviates from the core principles that have been laid out in this document.

Lastly, our proposed VEC shall also maintain a list of certified examiners (i.e. "Accredited VEs"). Each applicant seeking accreditation will understand the moral and legal requirements pertaining to their service as an accredited VE by requiring them to pass a written examination attesting their knowledge of 47 CFR, Part 97 and policies set by the coordinating VEC. No one shall be accredited by any other means.

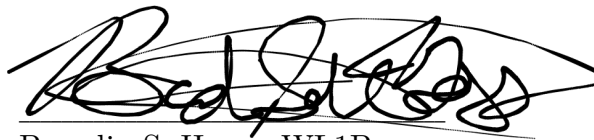
VIII. Summary and Conclusion

Submitted before the Commission is a petition to establish a new VEC. Reasons have been presented to merit an approval of a VEC with a continued approach to modernize amateur radio licensing for generations to come. Let the Commission be assured of our willingness to not only be an effective organization for amateur radio

licensing, but to provide a level of service to the public that conforms to the scope of national, state and municipal law. Our approach is modern, globalistic and exceedingly progressive in its core. The only remaining hurdle at this point is receipt of an approval from the Commission. We ask the Commission to take this opportunity to consider the information being presented with an open mind and obtain a clear understanding of our intent to operate as an independent VEC.

Therefore, the Aurora Amateur Radio Group respectfully petitions the Federal Communications Commission, Wireless Telecommunications Bureau to grant this application without prejudice or malice.

DATED this 14th day of September 2020.



Brandin S. Hess – WL1B
Club President



Joel W. Perry – KN4EWI
Club Vice President



Daniel Purgert – AD8GC
Club Director



Alan M. Reed – KN4YKN
Club Director

