



Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Docket:** 20-270

**Title:** Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 through 1.1109 of the Commission's Rules

To the FCC Commissioners:

The Silvercreek Amateur Radio Association (“SARA”) is an active club of amateur radio operators in the Northeast Ohio region. SARA is affiliated with the ARRL and is a recognized Special Service Club which is awarded to clubs that make exceptional efforts in the advancement of the radio arts and providing pro bono public volunteer services.

SARA objects to the blanket imposition of cost-based fees for licenses of the HA type for Individuals specified in III.b.25 for new issuance, modifications, and renewals of the FCC Part 97 amateur radio licenses. We object and ask the Commission to reconsider the fees proposed based on the following grounds:

- A) Based on the Commission’s own information, the processing of standard license management is almost entirely automated requiring no staff labor. While amateur radio license holders of types HA and HV are large in number, their burden on the licensing system is miniscule as almost all operations are automatic and require no significant support or interactions.
- B) Based on FCC policy, all license examination labor and costs are carried by the various accredited Volunteer Examiner Coordinators such as the ARRL. Thus, the FCC bears no costs for the testing and processing of new license and license upgrade examinations beyond the electronic filing in the ULS. The VEC program relies entirely on unpaid volunteers who desire to see new license holders and not only hold exam sessions, but train on their own time to be accredited to hold exams. This value must be calculated as an offset to the costs to maintain the amateur radio licenses.
- C) Amateur radio operators donate a significant amount of their time in public service enabled by amateur radio. In Ohio alone, as of the date of this filing, licensed amateur radio operators have donated, based on the BLS volunteer hour/value calculation rate, \$1,444,313.38 in volunteer hour value in 2020 – this during the time of the COVID-19 pandemic.



- D) At a time when the amateur radio service population is aging, clubs and organizations are trying to bring new youth into the hobby/service. For youth and college students, \$50 represents a substantial cost. This is especially true for disadvantaged populations that need easy entrance to STEM-related activities that they have historically not participated in. More and more focus is placed every year on STEM activities, including amateur radio, and financial disincentives should not be erected around the licensing process.

SARA respectfully requests that the FCC pursue a middle ground for the amateur radio licenses and cost-base filing, making a differentiation between the HA and HV radio service licenses:

- 1) All HA license applications, modifications, and renewals for the type Individuals should be processed without fee.
- 2) All HV license applications, modifications, and renewals should be charged the \$50 filing fee except for modifications for changes of address. HV license holders should also be offered a cost-free renewal that reverts their license to the HA class systematic issuance system.
- 3) All HA and HV license applications, modifications, and renewals for the type Amateur Club should be processed with the proposed \$50 fee.

We believe these modifications to the proposed fee structure would better balance the public benefit of the amateur radio licensed service with the requirements of the Congress to shift fees to cost-based values.

Sincerely,

Jason D. McCormick N8EI  
Vice President, Silvercreek Amateur Radio Association

On behalf of:

Executive Committee  
Silvercreek Amateur Radio Association  
Wadsworth, Ohio