

ARRL Files Comments Responding to FCC Request for Input

04/14/2025

[ARRL The National Association for Amateur Radio® filed comments \[PDF\]](#) with the Federal Communications Commission in response to its request for public input on alleviating unnecessary regulatory burdens by deleting or modifying rules, [In the Matter of Delete, Delete, Delete](#). Implementing ARRL's suggestions would promote and protect the art, science, and enjoyment of amateur radio, and enhance the development of the next generation of radio amateurs.

In response to ARRL's request, over 200 members submitted suggestions that were reviewed when considering what rules should be deleted or modified. ARRL will continue to engage with members and advocate for the Amateur Radio Service.

In its filing, ARRL asked the FCC to delete or amend the following rules:

Delete the LF and VHF/UHF Symbol (Baud) Rate and Bandwidth Limitations.

ARRL supports the deletion of these restrictions as proposed by the Commission in late 2023. Doing so would enhance Amateur experimentation with digital technologies.

Update and Modernize Entry Level Technician Class License Privileges.

ARRL reiterated its earlier proposal for extending additional limited privileges for Technician class operators. Adopting its proposal would provide new licensees an introductory window to HF data and phone communications that are at the core of the Amateur Radio experience and serve to incentivize the next generation of technical leaders just as Novice CW HF privileges did for earlier generations of operators.

Modernize 80/75 Meter Subband Divisions.

ARRL requested action on an earlier proposal that would make more efficient and intense use of the 80/75 meter band. Changes in technology and modes since band usage was last addressed have resulted in overcrowding in one band segment that would be alleviated by adoption of ARRL's proposal.

Delete and Replace Obsolete Digital Code Limitations.

ARRL also asked the FCC remove provisions that refer to digital codes that today are obsolete and permit Radio Amateurs to experiment freely with new digital codes, so long as such codes

are publicly documented and decodable over the air.

Implement Changes to Third Party Rules Adopted Internationally at WRC-03.

Although the United States fully supported changes to the ITU Radio Regulations in 2003 that removed a treaty requirement for third-party messages, there is no record of this change having been considered and the FCC's rules were never conformed to the new provision. Being the only nation known to continue to require a formal treaty for such purposes has resulted in no new such treaties since the treaty changed more than two decades ago. Thus ARRL asked the FCC to Implement rules that are consistent with those internationally agreed to align with the rest of the world.

Delete Amplifier Drive Limitation.

ARRL requested that the Commission act favorably on a pending proposal to remove limits HF amplifier gain that add to Amateur equipment cost and impede use of new efficient amplifier technology.

Remove Non-current Personal Information in Amateur ULS records.

ARRL requested that the FCC complete a rule making in which it proposed that only current licensee information to be visible in the public (ULS) database. Right now, if an amateur changes their address to a Post Office Box to shield their home address, the previous address remains visible. ARRL advocates for protecting the privacy of radio amateurs.

Delete Obsolete Identification Requirement for Special Call Signs

Users of special event call signs are required to identify with the FCC-issued responsible call sign at least once each hour. This can be confusing, especially on data and CW modes. ARRL proposed reliance on the web-based database that clearly identifies each special event call sign and authorized period of use.

Delete Obsolete Paper License Replacement Provision

The FCC no longer mails physical copies of amateur radio licenses, so ARRL suggested deleting the rule that provides for sending paper replacements as obsolete.

The [FCC notice](#) [PDF] generated a lot of interest among radio amateurs, with hundreds of Amateurs submitting comments directly to the FCC as well as responding to ARRL's request for suggestions.

The FCC deadline for filing reply comments is April 28, 2025.

It is hoped that the Commission will incorporate worthy suggestions in a future Notice of Proposed Rulemaking (NPRM) later this year. At that time there will be a new opportunity for public comment on the specific rules that the Commission proposes to delete or modify.

