

THE REPEATER

Newsletter of the North Shore Emergency Association

Vol. 54, No. 2

September, 2020

www.NSEA.com

FCC GMRS DATA

Total Active GMRS Licenses =
Total Active GMRS in Illinois =
Number Issued in August = 3,012
Number July in Illinois = 88

NSEA DATA

Regular Voting Members = 15
Probationary Members = 1
Auxiliary Members = 8
Out-of-Area Members = 6
Applicants = 14
Affiliated GMRS Users on Roster = 49
Added on Systems - Last 3 Months = 9
Added on Systems - Last 30 Days = 4

FOR REPEATERS PERMISSION

Click this link:

<https://nsea.com/Contact.html>

FOR FCC RULES

Click this link:

https://www.ecfr.gov/cgi-bin/text-idx?SID=b7b411dcef7e2b190049b5ebfc58be1c&tpl=/ecfrbrowse/Title47/47cfr95main_02.tpl

FOR NSEA RADIO PROCEDURE

Click here:

<https://nsea.com/Radio%20Procedure.pdf>

TRAINING FOR GMRS OPERATORS

WEATHER SPOTTING

Skywarn online training:

https://www.weather.gov/lot/spotter_talk

For Reporting: (800) 692 – 2110

FCC PROPOSES NEW FEE TO PROCESS APPLICATIONS

As many of you may have been aware, the fee charged by the FCC to process GMRS (and many other) license applications has been set by the U.S. Congress as a matter of law since 1986. The Commission had no authority to determine what is charged. Prior to 1986 the FCC had set the various amounts for different radio services by Rule.

When Congress stepped in in 1986, it set the fee to process GMRS applications the same as the “commercial” Part 90 services. To understand this, a little review of GMRS licensing is in order. Prior to 1999, when the FCC adopted the Universal Licensing System (ULS), GMRS applications and licenses were very different.

Licenses for Part 95A were very similar to Public Safety, Business Band, etc. Extensive technical details were required in the application and specified on the license. For example, for each transmit frequency the station class had to be specified, e.g. base (code FB), fixed (FX), repeater (FB2), mobile (M), etc. Also required were emission designator (20K0F3E - FM voice), exact location of the station and antenna, ground elevation, antenna height, output power, and for mobiles, number of units.

Because the same application form and same processing applied to both GMRS and Part 90 licenses, setting the fee the same for both made sense.

But that all changed with adoption of ULS and vastly simpler licensing for GMRS. No technical data is required now for GMRS and no technical review for processing is now performed or even possible. But the fee did not change since it was set by law by Congress. Moreover, the statute provided for regular, automatic increases using the cost of living index.

THOUGHTS ON FCC NPRM

You editor has carefully read and reread the portions of the new FCC Proposed Rulemaking relevant to GMRS. While ¶11 of the Notice of Proposed Rulemaking (NPRM) describes a methodology to “estimate” costs to process “personal applications”, no actual numbers are revealed what the actual cost is “estimated” to be. No average amount of time to process a GMRS application is revealed. And FCC employees who process GMRS are in Gettysburg, not Washington!

So how can anyone have any idea if the proposed cost, \$ 50.00, bears any reasonable relation to the true actual cost to recover? And why is 20% a reasonable amount to add for “overhead”? No explanation, of what overhead includes is given.

The Commission is careful to not estimate costs for each radio service, but rather groups of similar services, such as “Personal Licenses”. But even a cursory examination of Form 605 immediately reveals that of all the “Personal License” applications, GMRS is far more simple to complete and process than any other. It has the fewest items to complete, and unlike all the others, no Supplement to complete and attach.

GMRS users have strongly felt for many years that the charge to process our applications far outstrips actual costs. Given that the Commission admits that such processing is “highly automated” this is reasonable.

Among ALL of the proposed new fees, \$ 50.00 is the lowest minimum amount proposed for ANY application. The FCC clearly *assumes* it costs \$ 50.00 to any processing of ANY of the 167 kinds of application and is a de minimis minimum. This flies in the face of fees based on actual costs to recover.

For those of you who check the FCC license database for GMRS, several things

DISASTERS (FEMA)

IS-100.c - Introduction to the Incident Command System (ICS);

IS-230.d – Fundamentals of Emergency Management; and

IS-700.b – An Introduction to the National Incident Management System (NIMS).

<https://training.fema.gov/is/>.

FEMA SID number:

<https://cdp.dhs.gov/femasid>

YOUR ARTICLE FOR THE REPEATER COULD APPEAR HERE

This was very unfair to GMRS applicants using the new, vastly simplified application form (605). We have been paying way more than our fair share of application processing fees, supporting other, more complicated services.

To be fair to the Commission, it did eliminate the “Regulatory Fee” portion of our change – something it still had jurisdiction to, do. And to further alleviate the unfair burden to GMRS it also extended the GMRS license term from 5 to 10 years. So that is how we have wound up today paying \$ 70.00 to get our GMRS licenses.

That is how things have stood for almost 21 years. But now everything has changed! In 2018 Congress amended the relevant provisions of the Communications Act to return authority to the Commission to again set license processing fees by Rule. This became effective October 1, 2018.

Now, some 2 years later, the FCC has finally gotten around to establishing a fee schedule by Rule. The proposal is some 114 pages long, and is contained in a Notice of Proposed Rulemaking in MD (Managing Director) Docket No. 20-270, adopted on August 12, 2020 and released on August 26th. Comments may be filed with the Commission until 30 days after the NPRM is published in the *Federal Register*. As far as I can tell, this has not yet happened.

Of primary importance is that the new law, as adopted by Congress, requires that the Commission set **“fees to recover the costs of the Commission to process applications.”** The Commission claims that “We seek comment on the estimates and whether we have included the appropriate steps in processing the application in estimating the costs.” But totally missing is any data on the average time an FCC processor takes to complete a GMRS application, as opposed to other, more complicated services.

How disingenuous can you get? You claim to seek comment but furnish no data in order to make such assessment.

suggest automated processing without review or correction. Some last names have 3 or 4-digit numbers. Some licenses are all capital letter, some all lower case, and some mixed.

So, GMRS users have a number of good reasons for thinking that the actual cost to process our applications is significantly lower than \$ 50.00. Once again we are being singled out to shoulder way more than our fair burden of the costs to process applications. Once again we are paying to defray costs of other, more complicated services.

When is the FCC ever going to make this right? After more than 20 years, isn't it about time?

EVANSTON .700 REPEATER

It's been several months since the frequency element in the Evanston .700 repeater failed. Marc had fabricated from scratch a replacement circuit, but, now, it too has failed. It seems it is time to move on to more modern technology!

This means replacing the Evanston repeater with a newer, programmable unit. Marc is considering using his .650 repeater at Evanston to get things back on the air promptly. But this would mean sacrificing, at least for now, getting the .650 system back on the air.

What do you think how this situation should be handled? What other modern repeater equipment may be available? Are any new sites for .650 on the horizon?

NEIGHBORHOOD WATCH PROJECT

In last month's REPEATER I mentioned the possibility of a new project assisting North Shore law enforcement authorities. Please give this potential opportunity your careful attention. At our next meeting later this month, hopefully we can discuss the pros and cons and we would love to hear from you.

At a minimum we need to hear how many members and other radio volunteers might be interested in participating in such a project. And, careful planning to avoid pitfalls and maximize benefits is vital.

Would you like to contribute to The Repeater? Submissions are encouraged. Send to Randy@NSEA.com.