

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
Amendment of the Amateur Service Rules ) WT Docket No. 09-209  
Governing Vanity and Club Station Call Signs )

## **MEMORANDUM OPINION AND ORDER**

**Adopted: January 3, 2012**

Released: January 11, 2012

By the Commission:

## I. INTRODUCTION AND EXECUTIVE SUMMARY

1. In the *Report and Order* in this proceeding, the Commission amended the amateur radio service rules by, *inter alia*, imposing limits on club station licenses and call signs.<sup>1</sup> The American Radio Relay League, Inc. (ARRL) filed a petition for partial reconsideration of the *Report and Order*.<sup>2</sup> ARRL argues that further rule amendments are required to fully implement the intent of the rules adopted in the *Report and Order*. As set forth below, we conclude that ARRL's concerns are already addressed by our licensing rules and processes, so we deny the petition.

## II. BACKGROUND

2. This matter involves vanity call signs assigned to amateur service club stations. When an amateur station is initially licensed, the Commission assigns the station the next available call sign on an alphabetized list of call signs, based on the licensee's geographic region and license class.<sup>3</sup> This call sign is known as a sequential call sign. The licensee may then request the assignment of a specific unassigned and otherwise assignable call sign that represents something of significance to the licensee, such as one's initials. A call sign that has been selected by the licensee is known as a vanity call sign.

3. For purposes of obtaining an amateur service club station license, a club is a group of at least four persons that has a name, a document of organization, management, and a primary purpose devoted to amateur service activities consistent with Part 97 of the Commission's Rules.<sup>4</sup> The club station license is granted to the person who is designated by an officer of the club as the license trustee.<sup>5</sup>

4. In the *Report and Order* in this proceeding, the Commission amended and clarified its rules with respect to vanity call signs and club station licenses to promote processes that are more

<sup>1</sup> See Amendment of the Amateur Service Rules Governing Vanity and Club Station Call Signs, *Report and Order*, WT Docket No. 09-209, 25 FCC Rcd 16351, 16358 ¶¶ 27-28 (2010) (*Report and Order*).

<sup>2</sup> See American Radio Relay League, Inc., Petition for Partial Reconsideration (filed Jan. 13, 2011) (ARRL Petition). The ARRL Petition was placed on public notice. No comments were received.

<sup>3</sup> See 47 C.F.R. §§ 97.5(b)(1), (2); 97.17(d).

<sup>4</sup> 47 C.F.R. § 97.5(b)(2).

5 *Id*

equitable and administratively efficient. Among other rule changes, the Commission amended the rules to limit club stations to holding only one vanity call sign<sup>6</sup> and to limit an individual to being the trustee for only one club station license.<sup>7</sup> The purpose of these rule changes was to prevent club stations from obtaining an unfair share of desirable call signs, given that individuals are limited to holding one operator/primary station license (and, therefore, one call sign), while there was no limit on the number of licenses a club could hold.<sup>8</sup> Commenters urged the Commission to limit the number of club stations for which an individual could serve as licensee, pointing out that limiting the number of vanity call signs that a club can obtain would accomplish nothing if an individual could bypass the rule by creating multiple clubs.<sup>9</sup>

### III. DISCUSSION

5. ARRL supports the Commission's efforts to prevent club stations from obtaining an unfair share of desirable call signs but expresses concern that the specific rule language adopted by the Commission "does not preclude the abuses that the Report and Order intended to preclude."<sup>10</sup> Specifically, ARRL believes that if a club has multiple station trustees, each of these trustees could obtain a vanity call sign for the club, thereby allowing the club to obtain multiple vanity call signs.<sup>11</sup> ARRL also argues that a club could "'gam[e]' the club station vanity call sign system" by obtaining multiple FCC Registration Numbers (FRNs) and applying for a vanity call sign under each FRN.<sup>12</sup> As explained below, we do not believe that the vanity call sign system is subject to the abuses identified by the ARRL or that its suggested rule changes are necessary.

6. First, we note that a club may have only one license trustee at a time. Section 97.5(b)(2) of our Rules states, in part, "A club station license grant may be held only by *the person* who is *the license trustee* designated by an officer of the club."<sup>13</sup> Consequently, we believe that Section 97.19(a), which provides that "the person named in a club station license grant that shows on the license a call sign that was selected by a trustee is not eligible for an additional vanity call sign,"<sup>14</sup> effectively implements

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<sup>6</sup> See *id.* at 16359 ¶ 30. Club stations currently holding more than one vanity call sign may renew or modify their existing station license grants but may not obtain any additional vanity call signs. *Id.* Club stations may continue to obtain multiple sequential call signs. *Id.*

<sup>7</sup> See *id.* at 16359 ¶ 31.

<sup>8</sup> See *id.* at 16359 ¶¶ 29-30.

<sup>9</sup> See *id.* at 16359-60 ¶ 31.

<sup>10</sup> ARRL Petition at 4. ARRL also expresses disagreement with, but does not request reconsideration of, the Commission's decision not to adopt ARRL's suggestions to increase the number of call signs available in certain formats. *Id.* at 6. While ARRL suggests that the Commission take the matter up again in a future proceeding, see *id.* at 7, we have no plans to revisit the issue at this time.

<sup>11</sup> *Id.* at 5.

<sup>12</sup> *Id.* An FRN is a unique ten-digit number assigned to an individual or entity registering with the Commission. The FRN is used to identify the registrant's business dealings with the Commission.

<sup>13</sup> See 47 C.F.R. § 97.5(b)(2) (emphasis added).

<sup>14</sup> See 47 C.F.R. § 97.19(a).

the Commission's decision to limit club stations to holding only one vanity call sign.<sup>15</sup> Any application from a club for an additional vanity call sign when the club already is assigned a vanity call sign will be dismissed because the trustee is not eligible for an additional vanity call sign. Accordingly, we decline to revise Section 97.19(a) as ARRL requests.

7. With regard to ARRL's concern that a club could obtain multiple FRNs and thereby obtain multiple vanity call signs, we note that vanity call sign applications from club stations are checked not only with respect to whether the FRN on the application matches the FRN on the grant of a vanity call sign to any club station, but also with respect to whether the club name on the application matches the club name on the grant of a vanity call sign to any club station. Therefore, even if a club obtains or holds multiple FRNs, if an application is received from a club and the database shows that a club with the same name already has a vanity call sign, the application will not be granted, absent further review.<sup>16</sup> We accordingly conclude that the change that ARRL requests to Section 97.5(b)(2) is not necessary.

#### IV. CONCLUSION AND ORDERING CLAUSES

8. In summary, the petition does not provide any grounds for reconsidering the Commission's decision in the *Report and Order*. The concerns expressed by ARRL about licensees attempting to evade the rules adopted in the *Report and Order* are already addressed by our licensing rules and processes. We therefore deny the petition for reconsideration.

9. Accordingly, IT IS ORDERED that, pursuant to Sections 4(i), 303(r), and 405 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 303(r), and 405, and Section 1.429 of the Commission's Rules, 47 C.F.R. § 1.429, the Petition for Partial Reconsideration filed by the American Radio Relay League, Inc., on January 13, 2011 IS DENIED.

10. IT IS FURTHER ORDERED that proceeding WT Docket No. 09-209 IS HEREBY TERMINATED.

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch  
Secretary

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<sup>15</sup> A club station that wishes to receive another vanity call sign must surrender its currently held vanity call sign(s).

<sup>16</sup> We note that there are clubs that have identical names but are, in fact, separate and unrelated clubs. Further staff review of the application allows us to determine whether the clubs are distinct entities.