Kenneth Lyons, KN4MDJ Personally and on behalf of wB4SA - Radio Scouting, Inc, a Youth and Scout radio club for the BSA, Central Florida Council

Re: 20-270 Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 through 1.1109 of the Commission's Rules

OBJECTION

The proposed fee for Amateur Radio Licensure would prohibit youth entry in to the field with a financial burden. We provide one of the most active radio education programs in the country serving not only <u>our 26,000 scouts</u> in central Florida but provide services to several other councils affecting many tens of thousands. Last year (2019) we had **12,300 participants** that learned about radio technology including HF, VHF, UHF and all of them started by learning SOS in Morse code. Our youth range from 5 to 17 and several hundred moved to take the BSA Radio Merit Badge, which equates to half the FCC Tech licensure. We encourage scouts to move forward and get federally licensed so they can **be prepared** when camping by taking a VHF HT radio with them. All of our services are provided FREE OF CHARGE to the youth, from classroom instruction to hands on display/demonstration to them finally sitting down and taking the FCC Amateur radio licensure test under Laurel VEC. (Laurel VEC has no fees.)

I'd recommend and move that "Amateur Radio" be excluded from the fee provisions as it's not a commercial nor profitable endeavor and would pose an undue financial burden for all parties and eliminate youth entry.

For impact (last year, prior to covid), our program averaged about 1000 scouts each month, doing monthly and quarterly radio education events. Our summer camp "Radio Merit Badge+FCC Tech Lic" program is designed to teach and license up to 600 scouts each summer from our 12,000 attendees. If our program were rolled out nation-wide it could result in about 25,000 scouts getting licensed in the ~270 councils across the country each year. If the proposed licensure fee were applied, our projected costs would increase one million (\$1,000,000) dollars per year, reducing this vibrant program for youth and ending a path for youth to get licensure.

The FCC has very few costs associated for the "Amateur Radio" class as it is self-regulated, run by volunteer examiners and uses automated submissions with very little FCC interaction for licenses.

73 & YIS (yours in scouting),

President: Ken Lyons, KN4MDJ / Trustee for wB4SA Vice President: Justin Sligh, KN4MQR – Elected Secretary: Dean DeLong, KM4QMB – Elected Treasurer: Larry Schnaudigel, KN4LSY – Elected

BSA - Central Florida Council - www.RadioScouting.US/cfc







Oct 17th, 2020 JOTA / Jamboree on the Air. wB4SA 750+ Scouts learn SOS and get exposure to radio technology and Amateur Radio.