

February 24, 1984

Concurring Statement of FCC Commissioner James H. Quello

In re: Report and Order, General Docket 83-322; Requirements for Licensed Operators in Various Radio Services

I believe that the Commission has a legitimate role in the licensing of technicians for the various services it regulates. Insofar as licensing ensures a certain minimum level of competence, it can reduce the need for the Commission to expend scarce resources tracking down trouble after it develops.

Although I am satisfied that an adequate licensing program can produce significant benefits, I do not believe the Commission has had an adequate licensing program for a number of years. We have been unwilling to devote sufficient resources to the preparation of tests and to ensure that they were geared to state of the art technology. We have been unwilling to update our tests with sufficient frequency to prevent wide distribution of test questions. We have been unwilling to re-test upon license renewal to determine continued competence.

In short, our licensing program has, over the years, degenerated into essentially a paper exercise without significant meaning in terms of screening for competence. Obviously, many of those who hold FCC licenses are highly competent and perform their functions with a high degree of knowledge and skill. The point is that their skill level and the FCC license they hold have very little to do with each other. Today's Commission action to eliminate the licensing program is, in my view, merely a public acknowledgment of that sad fact.

Therefore, I concur.

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