



# PUBLIC NOTICE

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## Wireless Telecommunications Bureau Implements Enhancements to the Commission's Universal Licensing System and Antenna Structure Registration System and Adopts Final Procedures for Providing Access to Official Electronic Authorizations

WT Docket No. 14-161

### Final Procedures Effective 30 Days After Publication of this *Public Notice* in the Federal Register

Today, by this *Public Notice*, the Wireless Telecommunications Bureau (Bureau) announces the implementation of further enhancements to the Commission's Universal Licensing System (ULS) and Antenna Structure Registration (ASR) System and adopts final procedures for providing access to official electronic authorizations through these systems. Under these procedures, all commercial, private and public safety wireless service licensees and ASR registrants will access their current official authorizations in "Active" status<sup>1</sup> only through License Manager in ULS or ASR Dashboard in the ASR System or by email, unless a licensee or registrant notifies the Commission that it wishes to receive its official authorizations on paper through the U.S. Postal Service. Today's action marks another step in the Commission's process reform efforts, and allows the Bureau to modernize the Commission's wireless service licensing and antenna structure registration processes. As discussed in detail below, the Bureau takes the following actions:

- All licensees and registrants can access their official authorizations in Active status by securely logging into License Manager in ULS or ASR Dashboard in the ASR System. Once accessed, the licensee or registrant can download, save and print official authorizations, to the extent needed.

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<sup>1</sup> For purposes of this *Public Notice*, the term "authorization" includes all current commercial, private, and public safety wireless service licenses, commercial radio operator permits, vessel exemptions, and spectrum leases in "Active" status authorized under Parts 1, 13, 20, 22, 24, 26, 27, 74, 80, 87, 90, 95, 97 and 101 of the Commission's rules. The term also includes all current FCC Forms 854R, Antenna Structure Registrations, in "Active" status, including "Granted" or "Constructed," authorized under Part 17 of the Commission's rules. The term does not include current authorizations in any status other than "Active," including, for example, current authorizations in "Expired," "Cancelled," or "Terminated" status in ULS, or "Cancelled," "Dismantled," or "Terminated" status in the ASR System. In addition, the term does not include spectrum subleases or private commons arrangements, which the Bureau will continue to process on a manual basis, nor does the term include authorizations archived in ULS. Antenna Structure Registrations are not archived in the ASR System. Finally, we note that the Media Bureau manages the Consolidated Database System (CDBS), the Licensing and Management System (LMS), and the Cable Operations and Licensing System (COALS); the International Bureau manages the International Bureau Filing System (IBFS); the Office of Engineering and Technology manages the Experimental Licensing System (ELS); and the Office of Managing Director manages the Commission's Registration System (CORES). The enhancements and final procedures in this *Public Notice* apply only to ULS and the ASR System.

- A licensee or registrant can also obtain an electronic version of its authorization through email once its application is granted if the licensee or registrant voluntarily includes a valid email address in the application that it files through ULS or the ASR System, or that it provides to a private organization through which the applicant files applications, *e.g.*, a Frequency Coordinator, Volunteer Examiner Coordinator (VEC), or a Commercial Operator License Examination Manager (COLEM).
- Each official authorization includes a watermark “Official Copy” imprinted across the face of each page of the authorization to authenticate the official status of the license or registration.
- If a licensee or registrant chooses to notify the Bureau that it wishes to receive its official authorization(s) on paper through the mail, it may do so electronically, by telephone, or in writing. The Commission also retains the process by which licensees and registrants may apply through ULS or the ASR System to have duplicate paper copies of official authorizations mailed through the U.S. Postal Service.
- Finally, the Commission continues to provide unofficial reference copies of authorizations online through ULS and the ASR System. The unofficial copies include the watermark “Reference Copy” imprinted on the face of each page of the authorization.

An interim test period adopted in the *Initial Public Notice* released in this proceeding will continue until these final procedures become effective.<sup>2</sup> During the interim test period, the Commission will continue to print authorizations on paper and mail them out through the U.S. Postal Service to licensees or registrants unless a licensee or registrant notifies the Commission that it wishes to stop receiving authorizations on paper through the mail. The final procedures we are adopting today become effective 30 days after publication of this *Public Notice* in the Federal Register.<sup>3</sup> After the effective date of these final procedures is published in the Federal Register, the Bureau anticipates releasing, as additional outreach, a further public notice reminding licensees and registrants of that effective date.

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<sup>2</sup> Wireless Telecommunications Bureau Announces Enhancements to the Commission’s Universal Licensing System and Antenna Structure Registration System for Providing Access to Official Electronic Authorizations and Seeks Comment on Final Procedures, WT Docket No. 14-161, *Public Notice*, DA 14-1478, 29 FCC Rcd 12019 (WTB 2014) (*Initial Public Notice*). The *Initial Public Notice* was published in the Federal Register on October 29, 2014, 79 Fed.Reg. 64383 (Oct. 29, 2014).

<sup>3</sup> In the *Initial Public Notice*, the Bureau sought comment to better inform its decision-making process even though Section 4(b) of the Administrative Procedure Act (APA) exempts agencies like the Federal Communications Commission from the general APA requirements to provide the public with advance notice and opportunity for comment when promulgating “rules of agency organization, procedure, or practice” – so-called “procedural rules.” *Id.* at 2, n.6 (citing 5 U.S.C. § 553(b)(A)). Section 3(a) of the APA requires agencies to publish their “rules of procedure” in the Federal Register, 5 U.S.C. § 552(a)(1)(C), and Section 4(d) generally requires an agency to publish its substantive rules 30 days prior to the date on which the rules become effective, *id.* § 553(d). Because Section 4(d) expressly applies to substantive rules and not to procedural rules, the requirement to publish the final procedures adopted today 30 days before they become effective is inapplicable in this proceeding. The Bureau has nevertheless decided to provide for a 30-day period after publication in the Federal Register before the final procedures become effective to provide licensees and registrants with an ample measure of time to facilitate their use of these new procedures.

## **BACKGROUND**

Stations in Wireless Radio Services may be operated only with a valid authorization granted by the Commission,<sup>4</sup> and owners of antenna structures that require notice of proposed construction to the Federal Aviation Administration (FAA) must register the structure with the Commission.<sup>5</sup> Once an application is granted, ULS or the ASR System generates an authorization from information provided in the granted application. Historically, the Bureau has then printed each authorization on paper, placed it in a postage-paid envelope, and mailed it out through the U.S. Postal Service to the licensee or registrant.

On February 14, 2014, the FCC Staff Working Group released the Commission's "Report on FCC Process Reform," recommending that, "to the extent permitted by Federal records retention requirements," licensing Bureaus "should eliminate paper copies of licenses."<sup>6</sup> To implement this recommendation, in October 2014, the Commission enhanced ULS and the ASR System so that all licensees and registrants can now access the official electronic versions of their current authorizations in Active status by securely logging into License Manager or a registrant's ASR Dashboard. Once logged in, the licensee or registrant can download, save, and print copies of its authorizations, to the extent needed.

In conjunction with the Commission's enhancements to ULS and the ASR System, the Bureau released the *Initial Public Notice*, in which the Bureau deemed the electronic version of an authorization stored in ULS or the ASR System as the official Commission document and sought comment on certain final procedures for licensees and registrants to access official authorizations electronically through License Manager, through ASR Dashboard, and by email.<sup>7</sup> The *Initial Public Notice* also sought comment on options for receiving official authorizations on paper through the U.S. Postal Service.<sup>8</sup> Finally, the *Initial*

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<sup>4</sup> 47 C.F.R. § 1.903(a). Section 1.907 defines "Wireless Radio Services" to include "[a]ll radio services authorized in parts 13, 20, 22, 24, 26, 27, 74, 80, 87, 90, 95, 97 and 101 of this chapter, whether commercial or private in nature." *Id.* § 1.907.

<sup>5</sup> *Id.* § 17.4(a). While Antenna Structure Registrations are included within the definition of "authorization" for purposes of this *Public Notice*, the registration process for antenna structures is not a Wireless Radio Service.

<sup>6</sup> Report on FCC Process Reform, FCC Staff Working Group, Rec. 2.6, at 17 (Feb. 14, 2014). The Report further stated that "[c]onsideration should be given whether to have a transition period during which certain classes of licensees (such as small, rural providers or amateur radio operators) are excluded or permitted to opt-out of an electronic-only approach." *Id.* The Commission issued a public notice seeking comment on the Report. FCC Seeks Public Comment on Report on Process Reform, GN Docket No. 14-25, *Public Notice*, 29 FCC Rcd 1338 (2014).

<sup>7</sup> *Initial Public Notice*, 29 FCC Rcd at 12021-24. We also noted in the *Initial Public Notice* that lifetime commercial radio operator licenses issued prior to implementation of ULS that were not converted into the ULS database remain valid even though the licenses themselves are not stored in ULS. *Id.* at 12022, n.15.

<sup>8</sup> *Id.* at 12024-25. The comment period ended on November 10, 2014. We received 11 comments in response to the *Initial Public Notice*. Eight comments were filed on behalf of amateur service licensees: Michael D. Adams (Adams); the American Radio Relay League, Incorporated (ARRL); Richard S. Jandrt (Jandrt); David W. Johnson (Johnson); Nickolaus E. Leggett (Leggett); Victor Magana (Magana); W. Lee McVey (McVey); and Edward F. Pataky (Pataky). The remaining comments were filed by AT&T Services, Inc. (AT&T); the Enterprise Wireless Alliance (EWA); and the National Association of Manufacturers and MRFAC, Inc. (NAM/MRFAC). EWA filed comments one day after the filing deadline and McVey filed comments four days after the filing deadline. EWA requests acceptance of its late-filed comments, explaining that because the Bureau did not provide for the filing of reply comments in this proceeding, a one-day delay in filing EWA's comments would not adversely affect any other party. Request for Acceptance of Late-Filed Comments, filed by the Enterprise Wireless Alliance (Nov. 11, 2014). We agree that acceptance of both EWA's and McVey's comments does not adversely affect our consideration of any party's comments in this proceeding. We therefore grant EWA's request and on our own motion accept McVey's comments.

*Public Notice* provided for an interim test period, which will continue until final procedures become effective.

## **DISCUSSION**

### ***A. Official Electronic Authorizations***

*Background.* As explained in the *Initial Public Notice*, the Bureau's goal in this proceeding is to stop printing and mailing out official authorizations to the greatest extent possible.<sup>9</sup> While the Bureau is currently continuing to print and mail out authorizations on paper unless otherwise notified, in October of this year, the Commission enhanced ULS and the ASR System so that all licensees and registrants can also access the official electronic versions of their current authorizations in Active status through License Manager or ASR Dashboard.<sup>10</sup> The final procedures set forth in the *Initial Public Notice* would modify ULS and the ASR System so that the default setting would be not to print and mail out these authorizations. The Bureau sought comment on whether this process for providing current official electronic authorizations in Active status through License Manager or ASR Dashboard sufficiently meets the needs of licensees and registrants.<sup>11</sup> The Bureau also proposed a method by which a licensee or registrant could receive its official authorizations electronically through email.<sup>12</sup>

*Discussion.* We adopt the procedures as proposed. Once final procedures become effective, when an application is granted, ULS or the ASR System will generate an official electronic authorization. The Bureau, however, will no longer print out the authorization on paper or mail it to the licensee or registrant unless a licensee or registrant notifies the Bureau that it wishes to receive its official authorization(s) on paper. We find this electronic process will improve efficiency by simplifying access to official authorizations in ULS and the ASR System, shortening the time period between grant of an application and access to the official authorization, and reducing regulatory costs.<sup>13</sup> As described in Attachments A and B to this *Public Notice*, links to download authorizations in ULS can be found on the License Manager homepage and a registrant may download authorizations through its ASR Dashboard. Licensees and registrants may also download more than one authorization at a time. Once downloaded, licensees and registrants can save and print official authorizations, to the extent needed.

We further adopt the proposed method by which licensees and registrants can obtain electronic versions of their authorizations by email. We find that this procedure serves the public interest by providing licensees or registrants an additional method by which they may obtain electronic versions of official authorizations, in this case without accessing ULS or the ASR System. If an applicant includes a valid email address under "Applicant Information" (licensee) in a ULS application or under "Antenna Structure Ownership Information" (registrant) in an ASR System application, the Bureau will send the official

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<sup>9</sup> *Initial Public Notice*, 29 FCC Rcd at 12023.

<sup>10</sup> *Id.* at 12023-24.

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

<sup>12</sup> *Id.* at 12024.

<sup>13</sup> As explained in the *Initial Public Notice*, in 2013, the Commission printed and mailed out 451,072 registrations and wireless licenses alone, at a minimum cost of nearly \$304,000. *Id.* at 12021. Based on each license or registration consisting of one page, the cost of paper for the 451,072 authorizations was \$18,584.17; the cost of envelopes was \$10,374.66; the cost of postage was \$221,025.28; and the cost of staff resources was \$54,317.76, totaling \$304,301.87. The costs increased where an authorization consisted of more than a single page. *Id.* at 12021, n.11.

electronic authorization via email to the licensee or registrant upon grant of the application.<sup>14</sup> While in most cases a single authorization will be attached to a single email, the Bureau will attach all authorizations granted on the same day within the same system to a single email, to the extent capacity allows.

We further note that if an application is pending in ULS or the ASR System once final procedures become effective, and if the applicant or registrant did not include a valid email address in the pending application, the licensee or registrant may access the electronic version of the official authorization through License Manager or ASR Dashboard once the application is granted. An applicant or registrant may also amend a pending application to include a valid email address.<sup>15</sup> In that case, once the application is granted, the Bureau will email an electronic version of the official authorization to the licensee or registrant as already described.

The Bureau reminds licensees and registrants that this is a voluntary process and if a licensee or registrant does not wish to provide an email address in an application, it can instead continue to access official electronic authorizations through License Manager or ASR Dashboard. While the Bureau will email the licensee or registrant its official authorizations, the new procedure does not include sending an official electronic authorization by email to a “contact” listed on the application. Finally, the Bureau will send official electronic authorizations to valid licensee or registrant email addresses regardless of whether a licensee or registrant obtains its authorization(s) electronically through License Manager or ASR Dashboard, or elects to receive official authorizations on paper through the U.S. Postal Service.<sup>16</sup>

Several commenters support these procedures. EWA, a Commission-certified Frequency Coordinator that coordinates and files with the Commission approximately 9,000 to 10,000 Part 90 applications each year, “anticipates that a significant number of parties will choose to rely on electronic documents, if not immediately, then over time as the process becomes more familiar.”<sup>17</sup> The National Association of

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<sup>14</sup> Upon the effective date of these final procedures, the Bureau will also add a statement to the relevant ULS and ASR System application forms explaining this process, *i.e.*, if, upon grant of the application, a licensee or registrant wishes to receive the official electronic authorization by email, the applicant or antenna structure ownership information on the application must include a valid email address.

<sup>15</sup> To add an email address to or update email information included in an application pending in ULS or the ASR System, an applicant or registrant must file an application for “Administrative Update (AU).” *See* Wireless Telecommunications Bureau Announces Availability of the “Administrative Update” Function in the Universal Licensing System (ULS) Effective February 25, 1999, *Public Notice*, 14 FCC Rcd 3457 (WTB 1999) (listing information allowed in an Administrative Update). No application fees are associated with Administrative Updates in either system. *See id.* at 3457.

<sup>16</sup> In its comments, AT&T contends that those licensees and registrants that elect to stop receiving authorizations on paper during the interim test period and that have provided an email address on a pending application that is granted during that time period should receive an email with the authorization attached, or at a minimum, an email that includes a link to the authorization in ULS or the ASR System. Comments of AT&T, filed by AT&T Services, Inc. at 3-4 (Nov. 10, 2014) (AT&T Comments). We decline to provide electronic authorizations by email during the interim test period. We first note that no other person or entity has made a similar request. We also find that providing email-delivery during this interim period only to licensees and registrants that have elected to stop receiving authorizations on paper during the interim test period would complicate the process and create additional expense. If we were to implement immediately the entire email-delivery procedure adopted today, all applicants that have included an email address on an application currently pending in ULS or the ASR System, including those who continue to receive paper authorizations through the mail, would, without notice, begin receiving electronic authorizations delivered by email. It is important to note that the Bureau is working diligently to make all of the final procedures effective for everyone shortly.

<sup>17</sup> Comments of the Enterprise Wireless Alliance at 1-3, filed by the Enterprise Wireless Alliance (Nov. 11, 2014) (EWA Comments).

Manufacturers (NAM), which represents 14,000 small and large manufacturers in every industrial sector, in all 50 states, and MRFAC, Inc., a Commission-certified Frequency Coordinator for private land mobile bands and the frequency coordinating arm for NAM, support the Bureau's proposals as "a more expeditious and economical means of providing official authorizations to Commission licensees."<sup>18</sup>

AT&T also "welcomes and supports" the Bureau's proposals noting that the "changes will lead to a more efficient system to transmit authorizations, save Commission resources and reduce workloads for Commission licensees and registrants."<sup>19</sup> AT&T further notes that "authorizations sent to an email address that a licensee or registrant provides for receipt are likely to arrive at their ultimate destination and be processed more quickly than if sent by United States mail."<sup>20</sup> AT&T concludes that providing authorizations electronically "reduces the paperwork collection burden on licensees and registrants" and that it has "found License Manager and ASR Dashboard to be sufficient to meet its needs when official authorizations are needed."<sup>21</sup>

Those filing comments on behalf of amateur service licensees, however, raise concerns about electronic access as the default method for obtaining authorizations. In particular, ARRL, the national association for amateur radio, strongly recommends that we continue sending paper authorizations to new amateur licensees along with instructions to the licensee on how to access electronic versions or request paper copies of official modified or renewed licenses issued after the licensee receives his or her initial license.<sup>22</sup> ARRL's concern is that licensees do not interact with ULS during the current licensing process for the amateur service and that the new procedures could "discourage newcomers" to the amateur service or "make their experience difficult from the outset."<sup>23</sup> In addition, ARRL and other amateur radio commenters are concerned about ensuring the authenticity of licenses printed by a licensee from License Manager.

With respect to the interaction of amateur licensees with ULS, the Commission currently authorizes 14 Volunteer Examiner Coordinators (VECs)<sup>24</sup> to coordinate the efforts of Volunteer Examiner (VE)

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<sup>18</sup> Comments of National Association of Manufacturers and MRFAC, Inc. at 1-2 (filed Nov. 7, 2014) (NAM/MRFAC Comments).

<sup>19</sup> AT&T Comments at 1. AT&T explains that "[b]ecause the Commission sends authorizations in hard-copy paper form, licensees and antenna structure registrants must establish and maintain processes for preserving those authorizations, by either retaining the paper authorization in a file cabinet or converting the paper authorization to electronic form," thus requiring licensees and registrants to "spend substantial time, money, and resources tracking, scanning (or filing), and retaining the authorizations for every license or registered antenna structure." *Id.* at 2. AT&T further states that "[l]icensees and registrants can electronically save authorizations with a few key strokes and minimize the physical space needed to retain documents." *Id.* at 3.

<sup>20</sup> *Id.* at 2-3.

<sup>21</sup> *Id.* at 3.

<sup>22</sup> Comments of American Radio Relay League, Incorporated at 10 (filed Nov. 5, 2014) (ARRL Comments); *see also* Pataky Comments at 2 (stating same); Jandrt Comments at 1 (requesting that the Commission "continue sending original Amateur Radio Operator licenses"); Johnson Comments at 1 (stating that the Commission "needs to continue to print Amateur Radio License[s]"); Leggett Comments at 1 (stating that the "[o]fficial paper copies of amateur radio licenses should be made available"); and Magana Comments at 1 (stating that the Commission "should continue to provide paper license documents to Amateur Radio licensees, and is something that should not be discontinued").

<sup>23</sup> ARRL Comments at 4-6.

<sup>24</sup> The Commission-authorized VECs are: Anchorage Amateur Radio Club; American Radio Relay League (ARRL); Central America CAVEC, Inc.; Golden Empire Amateur Radio Society; Greater L.A. Amateur Radio Group; Jefferson Amateur Radio Club; Laurel Amateur Radio Club, Inc.; MRFAC VEC, Inc.; MO-KAN VEC

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teams in preparing and administering amateur service operation license examinations.<sup>25</sup> Before taking the examination, a candidate must provide to the VE team certain information needed for submitting a license application through ULS.<sup>26</sup> In most cases, the candidate fills out either online or on paper an NCVEC Quick-Form 605 Application for Amateur Operator/Primary Station License (NCVEC Form 605) produced by the VECs for use by VE teams.<sup>27</sup> Candidates who have not already obtained an FCC Registration Number (FRN) through the Commission's Registration System (CORES) before taking the examination also provide the VE team with a social security number. Once a candidate passes the examination, the VE team certifies that the candidate is qualified for a particular operator license class,<sup>28</sup> and forwards the candidate's information to the coordinating VEC. The VEC submits all application information received from the VE team in electronic batch files. CORES then generates FRNs as needed and ULS produces and processes FCC Form 605 applications from those files.

Once an application is granted, a new licensee who did not provide an FRN at the examination receives three separate mailings through the U.S. Postal Service: (1) a CORES-generated document providing his or her FRN; (2) another CORES-generated document that provides a temporary password for the FRN, along with instructions on how to obtain a permanent password; and (3) an official ULS-generated license printed on paper.<sup>29</sup> While the new licensee may then access CORES to obtain a permanent password, ARRL is concerned that, under the new procedures, licensees will also be required to access ULS to obtain their license electronically when they currently do not necessarily interact with ULS.<sup>30</sup>

We are cognizant that the new procedures may create confusion for amateur service licensees, however, we find that ARRL's concerns are overstated. Most importantly, the new procedures will not require any amateur service applicant to interact directly with ULS. To the contrary, if an applicant includes an email address when providing contact and other information to VE teams, that address will be processed as part of the ULS application and, once granted, ULS will email the electronic version of the new official authorization directly to the licensee.<sup>31</sup> While amateur licensees may access ULS to request paper copies

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Coordinator; Sandarc-VEC; Sunnyvale VEC Amateur Radio Club, Inc.; W4VEC Volunteer Examiners Club of America; W5YI-VEC; and Western Carolina Amateur Radio Society VEC, Inc. We note that Club Station Call Sign Administrators (CSCSAs) perform the same tasks for amateur service club and military recreation station licensees. ARRL, W4VEC Volunteer Examiners Club of America and W5YI-VEC are also CSCSAs. Wireless Telecommunications Bureau Announces Amateur Service Club and Military Recreation Station Call Sign Administrators, *Public Notice*, 16 FCC Rcd 286 (WTB 2001).

<sup>25</sup> 47 C.F.R. § 1.913(f).

<sup>26</sup> *Id.* §§ 1.913(f) and 97.17(b)(1).

<sup>27</sup> The NCVEC Form 605 is not an FCC form. *See* 47 C.F.R. §§ 97.17(b) (providing that "VEs may collect all necessary information in any manner of their choosing, including creating their own forms"); 1.913 (same).

<sup>28</sup> 47 C.F.R. § 1.913(f). The NCVEC Form 605 includes, at the bottom of the candidate's form, an area where the VE team certifies the operator license class for a candidate who has passed the examination.

<sup>29</sup> CORES, not ULS, generates the document providing a new licensee's FRN and the document providing the temporary password for the FRN. We again note that the procedures adopted today do not affect CORES procedures.

<sup>30</sup> ARRL Comments at 5. ARRL also states that while some amateur service licensees may interact with ULS to renew their licenses, many allow private organizations to perform that function for them. *Id.*

<sup>31</sup> We note that the NCVEC Form 605 includes a box for providing an email address on an optional basis. VECs could instruct VE teams to explain to a candidate for an amateur operator license that if he or she includes an email address, his or her official authorization will be emailed to the licensee once the application is granted.

of their authorizations or to download authorizations from License Manager if they choose, they are not required to do so and may avail themselves of the alternate methods described in the Attachments to this *Public Notice*.

We agree with ARRL that providing additional outreach and education regarding this transition would be highly beneficial. On the day the final procedures become effective, we will add a link on the ULS homepage and the homepages of certain wireless services to a new webpage entitled “How to Obtain Your Official Authorization,” which explains how licensees can access both the electronic and paper versions of their authorizations. We will also add a link on the ASR System homepage to a new webpage, entitled “How to Obtain Your Official Registration,” providing the same information for obtaining Antenna Structure Registrations. The information included on these new explanatory webpages is set forth in Attachments A and B to this *Public Notice*.

In addition to adding explanatory webpages in ULS and the ASR System, Bureau staff will work with each VEC, COLEM and Frequency Coordinator to educate new and existing licensees about the new procedures. We note that EWA, in its comments, states that “it will work with its members to familiarize them with the various options ... [and] assist those who need help in navigating License Manager in ULS or ASR Dashboard in the ASR System.”<sup>32</sup> EWA explains that it “provides this assistance today and will continue to do so as entities familiarize themselves with the authorization delivery options” adopted today.<sup>33</sup> We believe that this *Public Notice*, the explanatory webpages we are adding to the ULS and ASR System homepages, and additional outreach from these private organizations, taken together, will provide the vast majority of licensees with the information they need about the new procedures.

ARRL, as well as other commenters in the amateur service, also raises concerns about ensuring the authenticity of authorizations that licensees download and print from License Manager. Commenters note certain circumstances in which the Commission, as well as foreign, state, and local governments, requires paper copies of amateur service licenses. According to ARRL, the most urgent of these circumstances occurs when an amateur operator seeking an upgrade in license class must provide both an original and a copy of his or her current license to the VE team.<sup>34</sup> Commenters also note that requirements for obtaining European Conference of Postal and Telecommunications Administrations (CEPT) operating authority for reciprocal operation in CEPT countries and for obtaining an International Amateur Radio Permit necessitate a convenient method for licensees to obtain “demonstrably authentic license documents.”<sup>35</sup> Finally, commenters list certain situations where a state or local government may require a copy of an official license, including, for example, when an amateur radio operator who wishes to install an antenna at his or her residence files an application for a land-use authorization.<sup>36</sup>

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<sup>32</sup> EWA Comments at 3.

<sup>33</sup> *Id.*

<sup>34</sup> ARRL Comments at 7; *see* Pataky Comments at 1 (stating same).

<sup>35</sup> ARRL Comments at 8; *see* Pataky Comments at 1 (stating same); Adams Comments at 1 (stating that “traveling internationally, amateur radio operators are generally required to possess or present an official paper copy of their license”); Johnson Comments at 1 (noting that he is “applying for a reciprocal license in the Philippines and [he] needs to present a scanned copy of [his] license [to] the Filipino authorities to obtain a temporary permit to operate there”).

<sup>36</sup> ARRL Comments at 9; *see* Pataky Comments at 1-2 (stating same). According to ARRL, “[a] copy of an official license is needed: in many states in order to permit issuance of amateur radio call letter license plates; ... to have in hand at emergency communications deployments in order to entitle the radio amateur to access disaster sites in order to provide emergency communications for served agencies; by those served agencies for verification of identity of the disaster relief volunteer; and in many states, in order to demonstrate to law enforcement personnel that the radio amateur is exempt from statutes restricting the use of telecommunications devices while driving a motor vehicle.”

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Commenters contend that the type of paper the Bureau has used for printing authorizations substantiates the authenticity of a Commission-issued paper license. For example, ARRL states that “[i]f there is not a license printed on distinctive license stock by the Commission, authentication issues arise and the possibility of electronic alteration of a license document is created.”<sup>37</sup> To remedy the situation, ARRL suggests that we issue a separate public notice “explaining to third parties that a licensee-generated license document printed from the official license file in the ULS has the same validity and authenticity as a Commission-issued paper document.”<sup>38</sup> ARRL contends that an amateur service licensee could use the public notice “to persuade non-Federal authorities of the validity of a license document.”<sup>39</sup>

We first note that the Bureau stopped using “distinctive stock” and started using standard white recycled paper for printing authorizations earlier this year.<sup>40</sup> Thus, any plausible distinction between a Commission-printed authorization and a licensee- or registrant-printed authorization based on the type of paper used no longer exists. To address commenters’ concerns, however, the watermark “Official Copy” will be imprinted on each page of an official authorization that a licensee or registrant prints out from License Manager or ASR Dashboard.<sup>41</sup> While this enhancement should address ARRL’s concerns about “maintaining the integrity of the amateur radio examination process,” which “might be more difficult where something other than a Commission-printed license document on distinctive paper stock is presented to VEs at an examination session,”<sup>42</sup> we also note that VE teams regularly use other methods to authenticate the current license status of the examination candidate.<sup>43</sup>

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ARRL Comments at 9; Pataky Comments at 1-2; *see* Adams Comments at 1 (stating that “[i]n multiple situations involving individuals and domestic agencies unfamiliar with the amateur radio service, amateur radio operators find it helpful to have a printed copy of their license”); Leggett Comments at 1 (stating that “if an amateur operator wants to operate from a ship or an airplane, he will need to show his paper license to the captain”).

<sup>37</sup> ARRL Comments at 7; *see* Pataky Comments at 2 (stating same); Magana Comments at 1 (stating that “a licensee will never get the effect of the official paper and official paper color on some printers”); McVey Comments at 1 (stating that the “[t]he unique paper used for the Commission-issued license speeds along the validation process” for obtaining, for example, vehicle license plates that display a licensee’s call sign).

<sup>38</sup> ARRL Comments at 10; *see* Pataky Comments at 2 (stating same).

<sup>39</sup> ARRL Comments at 10.

<sup>40</sup> The paper the Bureau used previously was six times more expensive than the standard white recycled paper it now uses. One hundred sheets of the paper previously used cost \$4.12 (0.0412 cents per sheet), and 100 sheets of the standard white recycled paper the Bureau now uses cost \$0.65 (0.0065 cents per sheet).

<sup>41</sup> We note that licenses and registrations printed and mailed by the Bureau will also include the watermark “Official Copy” on each page of the authorization.

<sup>42</sup> ARRL Comments at 10. In particular, ARRL states that “because examination element credit is now afforded to licensees based on formerly held licenses, it becomes a burden in the future for VE teams (who are volunteers and who cannot be expected to have expertise in authentication of license status other than through a standardized license document) to verify license status without the ready availability of paper license documents.” *Id.* at 7-8.

<sup>43</sup> While Section 97.505 specifies what credit the VE teams must give certain license documents presented by a candidate for upgrade, 47 C.F.R. § 97.505, VE teams may use anything a VEC determines appropriate to authenticate that the person taking the examination has held the class of operator license that he or she claims to have held. For example, Commission rules allow administering VEs to give credit for a Certificate of Successful Completion (CSCE) issued by the VEC that coordinated the examinee’s previous examination. *Id.* § 97.505(a)(5). VE teams also might use other documentation to decide what is sufficient for authenticating that a candidate has held a particular class of operator license, including a “Callbook” listing a person who holds a Technician Class license or a listing in a club roster that shows the class of operator license.

## ***B. Official Paper Authorizations***

*Background.* While under our final procedures, the Commission, by default, will no longer print and mail out official authorizations, the Bureau proposed and sought comment in its *Initial Public Notice* on several options by which a licensee or registrant could notify the Bureau that it wishes to receive its official authorization(s) on paper through the U.S. Postal Service.<sup>44</sup>

*Discussion.* We adopt each option as proposed. License Manager and ASR Dashboard both now include settings that allow a licensee or registrant to notify the Bureau whether it wishes to receive official authorization(s) on paper. Once final procedures become effective designating electronic access as the default, if a licensee or registrant wishes to receive official authorizations on paper, the licensee or registrant can change the setting so that once an application is granted, the Bureau will print and mail out on paper the resulting official authorization(s) associated with the licensee's or registrant's FRN.<sup>45</sup> The procedures for changing the setting(s) are detailed in Attachments A and B to this *Public Notice*.

In addition, a licensee or registrant may contact the Licensing Support Center via webpage, phone, or mail to request paper authorizations. These methods are also detailed in Attachments A and B to this *Public Notice*. The Bureau notes that even if a licensee or registrant elects to receive paper authorizations using any of these options, the licensee or registrant may also continue to access its authorizations electronically through License Manager or ASR Dashboard, or by email where the applicant or registrant provides a valid email address in its application.

Finally, we note that the process for obtaining duplicate paper copies of licenses or registrations by filing an application, along with any applicable filing fee, through ULS or the ASR System remains available under our final procedures.<sup>46</sup> While under this modernized process the need to request a duplicate paper license or registration is virtually eliminated, the Commission has retained the capability in ULS and the ASR System as an option for obtaining paper copies of official authorizations.

We find that these options serve the public interest by providing licensees and registrants a variety of methods, electronic as well as by telephone or in writing, to notify the Bureau that they wish to receive official authorizations on paper through the mail. We agree with EWA, which supports the options, explaining that “[e]ntities have different internal processes for handling FCC authorizations that may be

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<sup>44</sup> *Initial Public Notice*, 29 FCC Rcd at 12024-25.

<sup>45</sup> Licensees or registrants that use more than one FRN must change the default setting for each FRN in each applicable system, ULS and ASR, to the extent they wish to receive official paper authorizations specifically associated with a particular FRN. For example, if Licensee A uses FRN1 and FRN2 in ULS and is also a registrant using FRN1 and FRN2 in the ASR System, Licensee A must change the default setting for both FRN1 and FRN2 in ULS to receive official paper licenses associated with those FRNs. Licensee A must also change the default setting for both FRN1 and FRN2 in the ASR System to receive official paper Antenna Structure Registrations associated with those FRNs.

<sup>46</sup> In wireless services and ASR, a “duplicate license” or “duplicate registration” is a duplicate paper copy of an official Commission authorization that is made available only to the licensee or registrant in the event an original license or registration has been damaged, lost, or destroyed. Using this process, a licensee or registrant must file an application through ULS or the ASR System to request a duplicate license or registration. Certain wireless licensees must also submit a filing fee along with the request for a duplicate license. See 47 C.F.R. § 1.1102. If the Commission grants the request, ULS or the ASR System generates an official duplicate authorization, which is then printed out on paper and mailed through the U.S. Postal Service to the licensee or registrant.

better suited to one approach versus another, at least initially, although [EWA] would hope that electronic documents will become the norm.”<sup>47</sup>

### **C. Unofficial Reference Copies of Authorizations**

As explained in the *Initial Public Notice*, electronically stored application and licensing data for authorizations in wireless radio services and application and registration data on antenna structures is available for public inspection via the ULS and ASR System websites.<sup>48</sup> The final procedures that we adopt today do not change this access. The Commission will continue providing unofficial reference copies of authorizations online through ULS and the ASR System with the watermark “Reference Copy” imprinted on each page. The reference copy includes the most recent information on the authorization, thus providing the public with current licensing or registration data without compromising the official status of the official authorization.

### **D. Posting, Record Retention and Other Rules Are Unaffected**

*Background.* The Bureau explained in the *Initial Public Notice* that some of the Commission’s wireless service-specific rules require licensees to retain current authorizations as part of their station records,<sup>49</sup> and, for some services, licensees must post paper copies of their station authorizations at certain locations.<sup>50</sup> In addition, the Bureau explained that Commission rules require antenna structure owners to post the Antenna Structure Registration Number at each facility,<sup>51</sup> and to provide all tenant licensees (and

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<sup>47</sup> EWA Comments at 3; *see* Adams Comments at 1 (stating that “[a]s long as it is easy to request a paper copy of the license, as long as such requests are fulfilled quickly, . . . the proposed change is acceptable, if perhaps somewhat inconvenient to amateurs”); ARRL Comments at 6 (stating that “[d]epending on the means by which the Bureau plans to educate individual licensees of these options and the efficiency of using email, mail or telephone options for requesting paper licenses, this is probably sufficient for most existing licensees”); and NAM/MRFAC Comments at 2 (stating that the *Initial Public Notice* “properly makes allowance for those licensees who may wish to continue receiving paper copies of their authorizations”).

<sup>48</sup> *Initial Public Notice*, 29 FCC Rcd at 12023 (citing 47 C.F.R. § 0.453(d)(4)); *see* 47 C.F.R. § 0.465(c)(3) (providing that “[c]opies of documents which are available or made available, for inspection under § 0.451 through § 0.465, will be prepared and certified, under seal, by the Secretary or his or her designee” for a fee).

<sup>49</sup> *Initial Public Notice*, 29 FCC Rcd at 12026 (citing 47 C.F.R. §§ 22.303 (requiring cellular licenses to be “retained as a permanent part of the station records” and a clearly legible photocopy of the authorization to be “available at each regularly attended control point of the station, or in lieu of this photocopy, licensees may instead make available at each regularly attended control point the address or location where the licensee’s current authorization and other records may be found”); 87.103(a) and (c) (requiring aeronautical fixed location and mobile station licenses to be retained in the station’s permanent records); 90.437(a) and (b) (requiring public land mobile radio service authorizations to be retained in the permanent part of the station’s records and either a photocopy or an address where the current authorization may be found to be made available for each base or fixed station at every station control point)).

<sup>50</sup> *Id.* (citing 47 C.F.R. §§ 13.19 (posting requirements for commercial radio operators); 80.405(c)(1) (posting requirements for maritime stations other than public coast stations); 80.405(c)(2) (posting requirements for public coast stations); 80.407 (posting requirements for maritime radio operators); 80.411(b) (posting requirements for vessel certificates or exemptions); 87.103(b) (posting requirements for aircraft radio stations); 97.213 (posting requirements for amateur radio station licenses); 101.215 (posting requirements for fixed microwave licenses)).

<sup>51</sup> *Id.* (citing 47 C.F.R. § 17.4(g) and further explaining that where posting of the Antenna Structure Registration Number is not required because the posting would detract from the appearance of an historic landmark, the owner must make the Antenna Structure Registration Number available to representatives of the Commission, FAA, and the general public upon reasonable demand, 47 C.F.R. § 17.4(h)).

permittees) on the structure access to a copy of the FCC Form 854R, Antenna Structure Registration.<sup>52</sup> The Bureau further stated that enhancing the Commission’s licensing and Antenna Structure Registration systems to replace official paper authorizations with official electronic authorizations does not affect any of these rules.<sup>53</sup> Finally, the Bureau explained that while the default setting under the final procedures would be set so that the Bureau would no longer print and mail out official paper authorizations, the setting would have no effect on how the Commission processed other applicant, licensee or registrant correspondence and notices generated by ULS or the ASR System.<sup>54</sup>

*Discussion.* ARRL and other commenters argue that certain rules regarding posting of authorizations and processing of correspondence should change to effectuate the new procedures. ARRL first contends that if the Commission eliminates the default mailing of paper licenses to amateur service licensees, it should consider eliminating rules that require posting of paper licenses at transmitter sites.<sup>55</sup> Similarly, while it supports the requirement that licensees retain copies of their authorizations as part of their station records, EWA recommends that the Commission consider eliminating the rules that require Part 90 licensees to maintain physical copies of their authorizations for base and other fixed stations at every station control point.<sup>56</sup> Finally, NAM/MRFAC urge the Commission to consider using electronic delivery for letters that ULS generates when an application is returned as defective.<sup>57</sup> We do not disagree with commenters’ recommendations that amendment or elimination of these rules or processes should be considered one day. EWA, however, is correct that its recommendation falls outside the scope of this proceeding,<sup>58</sup> as do the other commenters’ suggestions. We similarly reject, as outside the scope of this proceeding, ARRL’s argument that Section 97.23, which requires each amateur license grant to include the licensee’s mailing address, which must be in an area where the licensee can receive U.S. Postal Service, should be amended

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<sup>52</sup> *Id.* (citing 47 C.F.R. § 17.4(f)).

<sup>53</sup> The Bureau further notes that the Commission adopted revisions to its Part 17 rules, which became effective October 24, 2014, including modified requirements for posting Antenna Structure Registration Numbers and mailing registrations to tenant licensees and permittees. In the Matter of 2004 and 2006 Biennial Regulatory Reviews – Streamlining and Other Revisions of Parts 1 and 17 of the Commission’s Rules Governing Construction, Marking and Lighting of Antenna Structures, WT Docket No. 10-88, *Report and Order*, FCC 14-117, 29 FCC Rcd 9787, 9797-98, at ¶¶ 23-27 (2014). The enhancements and final procedures adopted in this *Public Notice* are independent of the proposals adopted in that rulemaking.

<sup>54</sup> *Initial Public Notice*, 29 FCC Rcd at 12024, n.21.

<sup>55</sup> ARRL Comments at 8 (citing Section 97.213 of the Commission’s rules, 47 C.F.R. § 97.213, which requires posting of licenses where an amateur service licensee uses telecommand of a remotely located amateur radio station on land, as an example). According to ARRL, anyone who wants to verify the license status of a licensee can obtain an unofficial reference copy of the license from ULS. *Id.*

<sup>56</sup> EWA Comments at 4 (citing 47 C.F.R. §90.437(b)). EWA contends that because “there is no way to confirm that the license copy posted at the control point is valid and current without verifying its accuracy by comparing it to the ULS reference copy, it is not clear what the value of the paper copy has on its own.” *Id.*

<sup>57</sup> NAM/MRFAC Comments at 2. NAM/MRFAC assert that “[r]ather than use a potentially significant portion [of the time allowed in a return letter to amend an application] with paper mailings, both the Commission and applicants would benefit from electronic delivery of return letters – at least in those instances where the applicant has furnished an email address.” *Id.*

<sup>58</sup> EWA Comments at 4.

to replace mailing addresses with other alternatives, including email addresses, for use in Commission correspondence.<sup>59</sup>

Finally, we reject ARRL’s contention that Section 97.29 must be amended.<sup>60</sup> Section 97.29 provides that “[e]ach grantee whose amateur station license grant document is lost, mutilated or destroyed may apply to the FCC for a replacement in accordance with § 1.913 of this chapter.”<sup>61</sup> As we stated earlier, we are retaining the capability for licensees to file applications through ULS as an optional means of requesting duplicate paper copies of official authorizations. Moreover, in the event a copy of an amateur service licensee’s official authorization is lost or destroyed, the rule, which is permissive, does not preclude the licensee from obtaining a replacement using other methods that do not require Commission action, including downloading and printing an official authorization from License Manager.

For further information on technical issues, contact Mary Bucher of the Technologies, Systems and Innovation Division, Wireless Telecommunications Bureau, at (202) 418-2656 or via email at [Mary.Bucher@fcc.gov](mailto:Mary.Bucher@fcc.gov); for further information on other issues, contact Cyndi Thomas, Mobility Division, Wireless Telecommunications Bureau, at (202) 418-2018 or via email at [Cyndi.Thomas@fcc.gov](mailto:Cyndi.Thomas@fcc.gov). For assistance accessing official authorizations through ULS or the ASR System, contact the Licensing Support Center at (877) 480-3201, Option 2; TTY (888) 225-5322, Option 2, or via the Support Center’s webpage at <https://esupport.fcc.gov/request.htm>.

Action by the Chief, Wireless Telecommunications Bureau.

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<sup>59</sup> ARRL Comments at 9. We also note that Section 1.5 of the Commission’s rules requires each licensee to “furnish the Commission with an address to be used by the Commission in serving documents or directing correspondence to that licensee.” 47 C.F.R. § 1.5. This rule applies across all Commission services, not just wireless services.

<sup>60</sup> ARRL Comments at 8.

<sup>61</sup> 47 C.F.R. § 97.29.

## **ATTACHMENT A – HOW TO OBTAIN OFFICIAL AUTHORIZATIONS (ULS)**

The following instructions explain methods by which a licensee can access in ULS its current authorizations in Active status that are authorized under Parts 1, 13, 20, 22, 24, 26, 27, 74, 80, 87, 90, 95, 97 and 101 of the Commission’s rules. Authorizations in any status other than “Active,” including, for example, current authorizations in “Expired,” “Cancelled,” or “Terminated” status, as well as authorizations archived in ULS cannot be accessed electronically. We note that the Bureau will continue to process, on a manual basis, spectrum subleases and private commons arrangements.

### **INSTRUCTIONS FOR DOWNLOADING OFFICIAL AUTHORIZATIONS**

The Commission currently provides both temporary and permanent links on the License Manager homepage to download current authorizations in Active status. The temporary link, “download your official electronic authorizations now,” can be found on a green bar across the top of the License Manager homepage. The permanent link, “Download Electronic Authorizations,” can be found in the navigation bar on the left side of the License Manager homepage.

### **INSTRUCTIONS FOR ACCESSING ELECTRONIC-ONLY OFFICIAL AUTHORIZATIONS**

The Commission also provides both temporary and permanent links on the License Manager homepage to access the default setting that allows licensees and registrants to notify the Commission whether they wish to receive authorizations on paper through the U.S. Postal Service. The temporary link, “Change your paper authorization preferences here,” can be found on a green bar across the top of the License Manager homepage. The permanent link, “Set Paper Authorization Preferences,” can be found in the navigation bar on the left side of the License Manager homepage. Once final procedures become effective, the default setting will look like this:

“Receive Paper Authorizations? \_ Yes x No”

If licensees wish to obtain official authorizations only electronically through ULS, they do not need to make any changes to the setting in License Manager. If the licensee does not change the setting, the Commission will no longer print and mail out official authorizations on paper through the U.S. Postal Service.

### **INSTRUCTIONS FOR RECEIVING OFFICIAL PAPER AUTHORIZATIONS**

If a licensee or registrant wishes to receive official authorizations on paper, the licensee can change the setting described above by checking the “Yes” box. Licensees using multiple FCC Registration Numbers (FRNs) must choose the setting for each FRN.

OR

The licensee may contact the Licensing Support Center via phone, web or mail. All requests must include the licensee’s FRN(s).

**Phone:** (877) 480-3201, Option 2; TTY (888) 225-5322, Option 2.

**Web:** <https://esupport.fcc.gov/request.htm>.

**Mail:** Send a letter to the Wireless Telecommunications Bureau, Technologies, Systems and Innovation Division, 1270 Fairfield Road, Gettysburg, Pennsylvania, 17325-7245.

If a licensee changes the setting described above to “Yes” or uses any of these other options, once an application is granted, the Commission will print and mail out on paper the resulting official authorization(s) associated with the licensee’s FRN(s). If a licensee elects to receive paper authorizations, the licensee can also continue to access its authorizations electronically through License Manager or by email where the applicant includes a valid email address in its application.

## **ATTACHMENT B – HOW TO OBTAIN OFFICIAL REGISTRATIONS (ASR System)**

The following instructions explain methods by which a registrant can access in the ASR System its current FCC Forms 854R, Antenna Structure Registrations, in “Active” status, including “Granted” or “Constructed,” that are authorized under Part 17 of the Commission’s rules. Registrations in any status other than “Active,” including, for example, current authorizations in “Cancelled,” “Dismantled,” or “Terminated” status, cannot be accessed electronically.

### **INSTRUCTIONS FOR DOWNLOADING OFFICIAL REGISTRATIONS**

The Commission provides a link, “Download Official Registration,” on a registrant’s ASR Dashboard homepage and under the “My Registrations” tab on its ASR Dashboard to download current Antenna Structure Registrations in Active status.

### **INSTRUCTIONS FOR ACCESSING ELECTRONIC-ONLY OFFICIAL REGISTRATIONS**

The Commission provides a link on the registrant’s ASR Dashboard homepage to access the default setting that allows registrants to notify the Commission whether they wish to receive registrations on paper through the U.S. Postal Service. Once final procedures become effective, the default setting will look like this:

“Receive Paper Registrations? \_ Yes  No”

If registrants wish to obtain official registrations only electronically through the ASR System, they do not need to make any changes to the setting in ASR Dashboard. If a registrant does not change the setting, the Commission will no longer print and mail out official authorizations on paper through the U.S. Postal Service.

### **INSTRUCTIONS FOR RECEIVING OFFICIAL PAPER REGISTRATIONS**

If a registrant wishes to receive official registrations on paper, the registrant can change the setting described above by checking the “Yes” box. Registrants using multiple FCC Registration Numbers (FRNs) must choose the setting for each FRN.

OR

The registrant may contact the Licensing Support Center via phone, web or mail. All requests must include the registrant’s FRN(s).

**Phone:** (877) 480-3201, Option 2; TTY (888) 225-5322, Option 2.

**Web:** <https://esupport.fcc.gov/request.htm>.

**Mail:** Send a letter to the Wireless Telecommunications Bureau, Technologies, Systems and Innovation Division, 1270 Fairfield Road, Gettysburg, Pennsylvania, 17325-7245.

If a registrant changes the setting described above to “Yes” or uses any of these other options, once an application is granted, the Commission will print and mail out on paper the resulting official registration(s) associated with the registrant’s FRN(s). If a registrant elects to receive paper registrations, the registrant can also continue to access its registrations electronically through ASR Dashboard or by email where the registrant includes a valid email address in its application.