

## The Creation of a New Volunteer Monitoring Program

To all SMs, OOs and OOCs:

ARRL, and especially its Ad Hoc Committee charged with revitalizing the Official Observer (OO) Program for the future, wants you to know the details of the new Volunteer Monitoring (VM) Program right away. At its July 2018 meeting just concluded, the ARRL Board of Directors approved a plan submitted by our Committee for the establishment of a new VM Program. This will be quite different from the OO Program that was created back in 1982. Based on extensive negotiations with the FCC, the new VM Program will improve the level of enforcement in the Amateur Service for years to come. It will help to fill the gap created two years ago when FCC closed many of its own field offices and retired much of its staff. That had the unfortunate effect of reducing its ability to respond to Amateur Radio enforcement problems.

The philosophy of the new program is simple. The success that Riley Hollingsworth, K4ZDH, had with Amateur enforcement over a ten-year period was due to rapid, visible response to significant, repeated enforcement issues. It is urgent that the new ARRL VM Program provide a means of doing the advance work for the FCC, especially in areas where there now are no nearby FCC field offices. Volunteer Monitors (VMs) will develop “patterned” reports of predicted times, days, bands, frequencies, transmitter locations or azimuths (if known) and types of operation of rule violators who act on a repeated basis. These “patterned” reports developed over time from individual VMs will be reviewed by ARRL Headquarters staff and forwarded by ARRL staff to FCC for action. This will allow FCC staff to very specifically empower its remaining field office personnel to gather evidence (which FCC has decided it must do for itself in every case) to cause enforcement actions to take place. We are assured that each patterned report will result in some contact by FCC with the subject of the complaint. Coordination of cases and evidence gathering will be the responsibility of the staff at ARRL headquarters and the FCC will retain the responsibility for the final decision on which cases they will take enforcement action.

So, working closely with FCC’s Enforcement Bureau, we have revised the concept for the Program going forward. At FCC’s recommendation, the OO program will be terminated soon and the VM program initiated simultaneously. There will be a new Memorandum of Understanding (MOU) with the FCC which is in the process of negotiation now. We will recruit a new roster of VMs, which will be much smaller than the current cadre of OOs. **We want existing OOs to apply to become VMs, and we want SMs to recommend to us good candidates, known to them, for the VM Program.** Not all who apply will be chosen to serve as VMs. The need to keep the total number of VMs small is to ensure that the program is manageable and efficient. VMs will be selected in part on geographic location, so that there are always VMs where needed and where the FCC isn’t present regularly. As they have done in the past, under the new Volunteer Monitor Program, ARRL Section Managers will continue to recommend qualified potential candidates from their Sections. We do not know the exact number of Volunteer Monitor positions necessary for the new program at this time. The final determination will be based on desirable geographic distribution. We expect there to be approximately 200 to 250 Volunteer Monitors in the new program, replacing the more than 700 in the OO program now.

We are in the process of revising the Training Manual for new VMs and we will establish a vetting process that will include telephone interviews of applicants for the VM program. All VMs will do their work anonymously. There will be identification numbers assigned to each VM and the VM roster will be known to ARRL only. There will be regular training sessions and ARRL staff will be in regular contact with the VMs to help coordinate their volunteer work on air so that multiple VMs are not working on the same case at the same time. We do not anticipate the need for a VM Coordinator since the program will be centralized, administered by ARRL staff. The training program, which is anticipated to be vigorous, will help identify the types of cases and specific information required in order to present significant violations to the FCC for ultimate action.

We plan to do training on a regular, ongoing basis, and FCC’s Enforcement Bureau staff will be working with us on regular webinars. VMs will serve for limited terms and apply regularly for reappointment. Participation in the training sessions will be one of the major criteria used to evaluate the performance of a Volunteer Monitor over time.

The task of observing and identifying significant and repetitive violations of Part 97 rules and regulations and reporting them in a structured way to FCC via ARRL staff is not the only function of a VM. The work will also

include, for those so inclined, direction finding to determine the location of the rule violator. Carried over from the OO program will be the preparation of FSD-213 Advisory Notices and FSD-15 Good Operator Reports to be sent as appropriate, via ARRL Headquarters. These peer-to-peer notices of the existing Amateur Auxiliary are a core component of the goal of keeping our amateur frequencies operating within the Part 97 rules. In addition the Local Interference Committees, which are another part of the current Amateur Auxiliary, will also continue to be used at the local and section levels.

It is important to note that until the new Volunteer Monitoring program is started in the next few months, current Official Observers and Official Observer Coordinators should continue to perform their important work. The ARRL wants to express its deep appreciation to all who are serving or have served as OOs or OOCs over the years for everything they have done to ensure proper amateur radio operations within established regulations and to encourage good operating practices. This work has been, and is, invaluable in providing effective monitoring of the Amateur frequencies and helping ham radio operators obey the rules. The goal of the OO program since its inception in 1982 was to encourage and promote compliance. While we have not always had the level of enforcement assistance we would ideally like from the FCC, overall, Amateur Radio is an exceptionally rule-compliant radio service, and that fact is largely due to the work, over the past 36 years of the OOs and OOCs.

As previously noted, the final details of the new Memorandum of Understanding with the FCC on this issue are still being ironed out. We are also still working out the details of the screening process for candidates as well as how the day to day operation of the new program will be administered. More information will be made available as we approach the initialization of the program sometime after the ARRL and the FCC have completed the MOU.

Underpinning all of this is the understanding that, for more than 36 years, the ARRL Official Observer program has aided thousands of amateurs in maintaining their transmitting equipment and keeping their operating procedures in compliance with FCC regulations.

ARRL and the FCC expect the new Volunteer Monitoring program will continue this high standard and will provide the amateur radio community with a heightened level of service.

We thank you for your patience and understanding as we work to modernize the Official Observer program, making it better equipped to meet the needs of the FCC and its Enforcement Bureau, our served agency. The new Volunteer Monitoring program is designed to better meet the needs enumerated by the FCC in the changing arena of amateur radio enforcement and compliance. As we finalize the new program and begin its implementation, we will work to keep you – the current field leadership and appointees – informed of the changes. This is a unique opportunity presented by the FCC to strengthen the atmosphere of compliance on our bands. We hope that when we begin solicitation of new volunteers for the Volunteer Monitor program that current OOs and OOCs will consider the criteria for the new program and decide to apply.

If you have any questions about these changes, please contact ARRL Regulatory Information Manager Dan Henderson, N1ND at ARRL Headquarters at 860-594-0236 or [n1nd@arrl.org](mailto:n1nd@arrl.org)

Respectfully,

Members of the ARRL Ad Hoc Committee on Revitalizing the Amateur Auxiliary Program:

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