



## Do You Know?

10 November 2018

1. Did you know that there are multiple specific purpose codes for amateur radio license applications and some of them exempt the applicant from answering the felony question?

2. The purpose codes include the following:

**AM** (Amendment) – The purpose of the application is to amend a pending application. Depending on the purpose of the pending application and how the felony was answered in the pending application, the amendment may require the felony question to also be answered.

**AU** (Administrative Update) – The purpose of the application is to update the administrative element of an existing license. Refer to MD, below, for an explanation of the license elements.

(1) This includes name changes, mailing address changes, e-mail address changes, and phone number changes.

(2) Applicants submitting an application to make administrative changes to an existing license are **not required to answer the felony question**.

**MD** (Modification) – The purpose of the application is to modify an existing license.

(1) Applicants submitting an application for the purpose of modifying their license are **always required to answer the felony question**.

(2) An amateur radio license consists of two elements, one of which is required to be changed in order to qualify as a modification.

(a) Technical element - **This is the required element of a modification.**

- License class
- Call sign
- A change to the technical element is limited to changing the license class and/or changing the call sign (Systematic or Vanity).

(b) Administrative element – This is optional.

- Name
- Mailing address
- E-mail address
- Phone number
- A change to the administrative element is limited to changing the items listed above.

**NE** (New) – The purpose of this application is to apply for a new amateur radio license. Applicants submitting an application for a new license are **always required to answer the felony question**.

**RO** (Renewal Only) – The sole purpose of the application is to renew the license without changes to the administrative portion of the license (See AU above, for the definition of the administrative portions of a license). The license must be eligible to be renewed.

(1) In SessionManager you can indicate the purpose is to renew a license and you can add administrative changes. SessionManager will actually create two applications which will be transparent to you but will make the FCC happy.

(2) Applicants submitting an application to renew their license (with or without administrative changes) **are not required to answer the felony question.**

**RM** (Renewal/Modification) – The purpose of the application is to renew and modify an existing license. Applicants submitting this type of application are **always required to answer the felony question.** There are two major components to this purpose:

(1) Renewal of the license – The license must be eligible for renewal

(2) Modification of the license

(a) A change to the technical element of the license (Change of license class and/or a change of call sign) is required.

(b) In addition to the required change in the technical element, optional changes to the administrative element may be included.

**WD** (Withdrawal) – The purpose of the application is to withdraw a pending application. Typically, this is done when the pending application contains an error.

3. Other VECs interpret the above definitions and requirements differently.

a. Some VECs believe that certain changes to the administrative element of a license, especially a name change, qualifies as a modification application when it does not.

b. Some VECs believe a renewal application that includes administrative updates qualifies as a Renewal/Modification even though the technical element of the license is not being changed.

c. One VEC submits every applicant's request for an Administrative Update as a modification application.

d. **The Laurel VEC does not concur with these misguided interpretations and more importantly, neither does the FCC.**

(1) During the annual meeting of the VECs and the FCC in August 2018, the Laurel VEC asked the FCC representatives for clarification of what qualifies as a modification of a license in the context of the MD and RM purpose codes. In their response, the FCC representatives confirmed the definitions and requirements described above for administrative updates, modifications, renewals, and renewal/modifications and emphasized the resulting unnecessary requirement for applicants to answer the felony question. These definitions and requirements described above can be found on the FCC website and in the instructions for completing FCC Main Form 605.

(2) Despite the FCC's clarification, 13 VECs continue to misinterpret the purpose codes.

4. **Now you know.**

Questions?