



# Do You Know?

By AA3RR

24 Dec 2015

1. Between 1984 and 1999, VECs used a modified version of FCC Form 610 shown below, as their application form. As you can see, while an SSN was not required the applicant's birthdate was.

FEDERAL COMMUNICATIONS COMMISSION 1270 FAIRFIELD ROAD GETTYSBURG, PENNSYLVANIA 17325-7245		<b>APPLICATION FORM 610 FOR          AMATEUR OPERATOR/PRIMARY STATION LICENSE</b>		Approved by OMB 3060-0003 See instructions for public burden.	
<b>SECTION 1 - TO BE COMPLETED BY APPLICANT (See instructions)</b>					
1. Print or type last name		Suffix	First name	Middle initial	2. Date of birth
					month - day - year
3. Mailing address (Number and street)				3A. Internet Address	
City				State Code	ZIP Code
4. I HEREBY APPLY FOR (make an X in the appropriate box(es)):					
4A. <input type="checkbox"/> EXAMINATION for a new license		4D. <input type="checkbox"/> CHANGE my mailing address on my license to my new address in Item 3			
4B. <input type="checkbox"/> EXAMINATION for upgrade of my operator license class		4E. <input type="checkbox"/> CHANGE my station call sign systematically (See instructions) Applicant's Initials _____			
4C. <input type="checkbox"/> CHANGE my name on my license to my new name in item 1. My former name was:		4F. <input type="checkbox"/> RENEWAL of my license			
(Last name) (Suffix) (First name) (MI)					
5. Unless you are requesting a new license, attach the original or a photocopy of your license to the back of this Form 610 and complete Items 5A and 5B.			5A. Call sign shown on license	5B. Operator class shown on license	
6. If you have filed another Form 610 that we have not acted upon, complete Items 6A and 6B.			6A. Purpose of other form	6B. Date filed	
				month - day - year	
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT, (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(A)(1)) AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).					
I certify that:					
<ul style="list-style-type: none"> <li>• all statements and attachments are true, complete, and correct to the best of my knowledge and belief and are made in good faith;</li> <li>• I am not a representative of a foreign government;</li> <li>• I waive any claim to the use of any particular frequency regardless of prior use by license or otherwise;</li> <li>• the station to be licensed will be inaccessible to unauthorized persons;</li> <li>• the construction of the station would NOT be an action which is likely to have a significant environmental effect (see the Commission's Rules 47 C.F.R. Sections 1.1301-1.1319 and Section 97.13(a));</li> <li>• I have READ and WILL COMPLY WITH Section 97.13(c) of the Commission's Rules regarding RADIOFREQUENCY (RF) RADIATION SAFETY and the amateur service section of OET/OET Bulletin Number 65.</li> </ul>					
7. Signature of applicant (Do not print, type, or stamp. Must match name in Item 1.)				8. Date signed	
X _____ ( ) Daytime Telephone Number				month - day - year	
<b>SECTION 2 - TO BE COMPLETED BY ALL ADMINISTERING VEs</b>					
A. Applicant is qualified for operator license class:				B. VEC receipt date:	
<input type="checkbox"/> NOVICE (Elements 1(A), 1(B), or 1(C) and 2) <input type="checkbox"/> TECHNICIAN (Elements 2 and 3(A)) <input type="checkbox"/> TECHNICIAN PLUS (Elements 1(A), 1(B), or 1(C), 2 and 3(A)) <input type="checkbox"/> GENERAL (Elements 1(B) or 1(C), 2, 3(A) and 3(B)) <input type="checkbox"/> ADVANCED (Elements 1(B) or 1(C), 2, 3(A), 3(B) and 4(A)) <input type="checkbox"/> AMATEUR EXTRA (Elements 1(C), 2, 3(A), 3(B), 4(A) and 4(B))					
C. Name of Volunteer-Examiner Coordinator (VEC):					
D. Date of VEC coordinated examination session:			E. Examination session location:		
<b>I CERTIFY THAT I HAVE COMPLIED WITH THE ADMINISTERING VE REQUIREMENTS IN PART 97 OF THE COMMISSION'S RULES AND WITH THE INSTRUCTIONS PROVIDED BY THE COORDINATING VEC AND THE FCC</b>					
1st VEs name (Print First, MI, Last, Suffix)		VEs station call sign	VEs signature (must match name)	Date signed	
2nd VEs name (Print First, MI, Last, Suffix)		VEs station call sign	VEs signature (must match name)	Date signed	
3rd VEs name (Print First, MI, Last, Suffix)		VEs station call sign	VEs signature (must match name)	Date signed	
FCC Form 610 - Page 1 September 1997					

2. Beginning in 1998 and lasting through December 2001, the FCC announced and implemented a flurry of actions.

- a. **17 September 1998** - The FCC adopted rules for implementing the Universal Licensing System.
  - Established requirements for the submission of Taxpayer Identification Numbers (TINs) in ULS consistent with the requirements of the Debt Collection Improvement Act of 1996.
  - Announced the creation of new application forms including the FCC Form 605.
  - All TIN information will be kept confidential per the Privacy Act of 1974.
- b. **Feb 1999** – The new FCC Form 605 is published.
  - Presumably, the NCVFC Form 605 was in design or production shortly after.
    - Has data box for TIN(SSN)
    - Has six license classes listed: Novice, Technician, Technician Plus, General, Advanced, and Amateur Extra.
- c. **May 1999** – The new FCC Form 606 – TIN Registration is published.
  - Must have a call sign in order to register
  - Multiple call signs can be associated with a single TIN
- d. **July 1999** – Updated FCC Form 605 made available.
  - By this time, NCVFC Form 605 was certainly in production and/or distribution.
- e. **23 July 1999** - FCC Issued Public Notice 99-1455
  - ULS will become effective on 16 August 1999.
  - Pre-ULS forms can be used until February 2000
- f. **8 Aug 1999** – FCC begins week-long phase-in period for converting existing amateur radio licensing data into the ULS database.
- g. **16 August 1999** – ULS becomes operational. ULS is the FCC's on-line, interactive means of filing and handing of Amateur Radio applications and is a major change in how applicants and licensees will deal with the FCC.

- **ULS Registration is required before licensees can use the ULS.**
  - Licensees use FCC Form 606 for electronic or manual registration.
  - Registration associates a licensee's TIN/SSN with their call sign.
  - Applicants also must specify a password and a personal identifier
  - Registrants receive a nine-character Licensee Identification Number.
    - Amateurs may use this number in place of a Social Security Number in future dealings with the FCC.
  - Once registered, licensees may file applications using the new FCC Form 605 electronically at any time of day, seven days a week.
  - **Non-hams are not permitted to register**
- **Amateurs are required to use FCC Form 605 for filing applications for all purposes except club station applications.**
  - Purposes include, license renewals, modifications (Except upgrades), cancellations, application withdrawals and amendments, as well as requests for a vanity call sign, duplicate license, and administrative updates.
  - FCC Form 605 is primarily designed for electronic use but will be available in paper form.
- **Applications for new licenses or upgrades will continue to be filed through a VEC.**
  - **VECs will use a special NCVFC Form 605--a variation of Form 605--to file with the FCC for test sessions.**
- **Accessing the ULS database requires a telephone modem.**
  - A toll-free number, 800-844-2784, connects users to the FCC's Wide Area Network.

- **ULS features a renewal reminder sent 90 days prior to a license's expiration date.**

h. **11 February 2000** – FCC announces that effective 17 February 2000, use of the new FCC form 605 is mandatory when filing applications via the ULS or manually with the FCC.

- **As a convenience for Amateur Service applicants and licensees, the FCC established an automatic TIN registration process for Amateur Service applications filed through VECs.**
  - Applicants for a new license and licensees who have not yet registered their TIN, must provide their TIN with the application when filing an application with a VEC.
  - When the VEC files the application on their behalf with the Commission, their TIN will be automatically registered in ULS. [**Auto Registration**]
  - If they have previously registered, they may, for added security, submit their License Identification Number to a VEC, rather than their TIN.

i. **9 Feb 2000** – FCC publishes Final Rule that restructures amateur radio licensing.

- The decision is effective 15 April 2000

j. **16 March 2000** – FCC announces CORES will be implemented effective 27 March 2000.

- At some point prior to this, the FCC made a decision to create a new privacy act system of records, called the “Commission Registration System” or CORES.

k. **21 March 2000** – FCC announces implementation of CORES is delayed until further notice.

l. **6 April 2000** – The FCC posted a Notice of new privacy act system of records in the Federal Register on this date. The new system is called the “Commission Registration System” or CORES. The proposed system was to be effective 16 May 2000.

**Note:** I suspect that the 16 March 2000 announcement was premature due to the delay in reporting the new system in the Federal Register and that is probably the reason the roll-out of CORES was delayed until 19 July 2000.

m. **15 April 2000** – Amateur licensing restructure implemented

- NCVEC Form 605 updated to reflect the changes of the licensing restructure.
  - Three license classes: Technician, General, and Amateur Extra
  - Three grandfathered license classes: Novice, Technician Plus, and Advanced.
    - Valid until upgraded or expired
- VECs had to update their CSCEs as well.
  - Exam elements reduced from 8 to 4 and license class reduced from 6 to 3.

h. **24 June 2000** – Amateurs who registered in the ULS prior to 22 June 2000 were automatically registered in CORES FCC beginning 24 June 2000.

i. **19 July 2000** – FCC announces that CORES is operational.

- CORES is a web-based, password-protected, registration system that assigns a unique 10-digit FCC Registration Number (FRN) for use when “*doing business*” with the FCC.
  - 31 U.S.C. 7701(c)(2) states in part that a person shall be considered to be “*doing business*” with a Federal agency if the person is an **applicant for or recipient of, a Federal license.**
- The same registration number can be used with all licensing and filing systems.
- The registration number will not replace call signs, license numbers, certification numbers, or other numbers in authorization of service documents.
- Enrollment/registration is voluntary – **Anyone can register for an FRN.**
- Voluntary registration can be done electronically or manually.
- Anyone applying for a feeable or non-feeable license should register

j. **15 Dec 2000** – FCC publishes NPRM proposing adoption of a mandatory FCC Registration Number (FRN)

k. **March 2001** – FCC modifies FCC Form 605

- Adds a place for an FRN to be entered
- TIN/SSN can still be entered
- Applicant's birthdate required
- NCVFC Form 605 probably modified to replace License ID Number with FCC Registration Number

l. **24 August 2001** – FCC adopts and publishes a Report and Order making FRNs mandatory effective 3 December 2001.

m. **November 2001** – FCC modifies FCC Form 605.

- Removes the option of providing an SSN/TIN
- An FRN is required to be entered

n. **3 December 2001** – **FRNs are mandatory for anyone “doing business” with the FCC including persons applying for an amateur radio license.**

- Subpart W added to FCC Part 1 rules
  - § 1.8001 FCC Registration Number (FRN).
  - § 1.8002 Obtaining an FRN.
  - § 1.8003 Providing the FRN in Commission filings.
  - § 1.8004 Penalty for failure to provide the FRN.
- § 1.8002 - **The FRN must be obtained by anyone doing business with the Commission** as defined in 31 U.S.C. 7701(c)(2), including but not limited to:
  - (1) anyone required to pay statutory charges under subpart G of this part;
  - (2) **anyone applying for a license**, including someone who is exempt from paying statutory charges under subpart G of this part, see §§ 1.1114 and 1.1162;

**Note:** Part 1, Subpart G, §1.1114 does not apply to amateur radio;

Part 1, Subpart G, §1.1162 states the following:

- **No regulatory fee established in §§1.1152 through 1.1156, unless otherwise qualified herein, shall be required for Applicants, permittees or licensees in the Amateur Radio Service, except that any person requesting a vanity call-sign shall be subject to the payment of a regulatory fee, as prescribed in §1.1152.**

**Note:** Vanity fees were eliminated effective 3 September 2015. Therefore, Part 1, Subpart G, §1.1152 no longer applies

**Note:** §§1.1153 through 1.1156 do not apply to amateur radio

**Note:** **31 U.S.C. 7701(c)(2)** states in part: “For purposes of this subsection, a person shall be considered to be doing business with a Federal agency if the person is... **an applicant for, or recipient of, a Federal license**, permit, right-of-way, grant, or benefit payment administered by the agency or insurance administered by the agency;”

**Note:** When FRNs became mandatory on 3 December 2001, two things happened:

1. **The VECs did nothing** – I can find no evidence to suggest that any VEC advised any applicant that having an FRN is a requirement when applying for a new license.

a. Interestingly, many VE Teams have established their own policy of not accepting SSNs without guidance or direction from their VEC or because the FCC rules require an applicant

to have an FRN. Their principal concern appears to be the recognition of the responsibility and potential liability associated with SSNs.

**2. The FCC did not turn off Auto Registration** – As a result, the VECs continue to accept SSNs despite the requirement for applicants to have an FRN when applying for a new license.

o. February 2011 – In a document about FCC Form 160, “CORES Registration Form,” the FCC made the following observation

***The Commission has determined that there are few if any “individuals” as such filing FCC Form 160, since most of these people are acting in their “entrepreneurial capacity” as “businesses.”***

p. **3 March 2011** - The ARRL submitted comments to a Notice of Proposed Rule Making (NPRM) adopted 9 Nov 2010, amending Part 1 of the Commission’s rules regarding CORES registration including the following:

*“For individuals, the TIN is their Social Security Number (SSN). Individual radio Amateurs are very sensitive about disclosure of SSNs. The fear of identity theft has made this concern more pronounced in recent years. The Commission should provide assurances to licensees about the confidentiality of their SSNs when submitted in CORES. Some Amateur Radio licensees in ARRL’s experience have decided to forego license renewals subsequent to the requirement of filing their SSNs due to concerns about the protection of their private information in CORES. Such an extreme response was of course unnecessary, but it illustrates the level of concern among licensees about SSNs in particular. Licensee entities in other services which provide EINs are typically not similarly sensitive.”*

While expressing the concerns of licensees regarding confidentiality of SSN and identity theft, the ARRL VEC has enacted no policy to protect applicants for a new license by requiring an FRN in lieu of an SSN as required by the FCC’s rules. And so far, neither has any other VEC.

q. **20 Dec 2018** – During a Webinar/Teleconference with the VECs, the FCC announced that they intend to discontinue “Auto Registration” but did not indicate when this will occur.