

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, DC 20554

In the Matter of:)
)
 Establishing a new Volunteer Examiner Coordinator in the Amateur Radio Service in accordance with 47 CFR 97.521)
)

**PETITION FOR AUTHORIZATION TO OPERATE AS A VOLUNTEER EXAMINER
 COORDINATOR IN THE AMATEUR RADIO SERVICE**

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I. INTRODUCTION AND STATEMENT OF INTEREST

As defined in 47 CFR 97.521, the Last Frontier Amateur Radio Society, Inc. of Palmer, Alaska (hereinafter referred to as “LFARS”, “Last Frontier Amateur Radio Society” or “Petitioner”) submits this non-docketed filing¹ for authorization to act as a certified Volunteer Examiner Coordinator in the Amateur Radio Service. This new Volunteer Examiner Coordinator would be responsible for the administration, preparation and coordination of amateur radio license examinations in strict adherence to Part 97, Subpart F entitled “Qualifying Examination Systems”. We petition the Commission to operate as a fully independent Volunteer Examiner Coordinator to administer amateur radio license examinations anywhere under direct authority of the Commission’s Rules².

II. BACKGROUND

The Goldwater-Wirth Bill³ marked a pivotal moment in the modernization of amateur radio licensing in the United States. Passed by the United States Congress and signed into law by President Ronald Reagan in 1982, this legislation introduced significant amendments to the Communications Act of 1934, specifically concerning the licensing process for amateur radio operators.

Prior to this law, all amateur radio license examinations were administered directly by the Federal Communications Commission (FCC), which placed a substantial administrative burden on the agency and often led to delays in examination scheduling and licensing. The Goldwater-Wirth Bill addressed this issue by authorizing the FCC to accept the voluntary and uncompensated assistance of licensed amateur radio operators in the preparation and administration of license examinations. This not only decentralized the examination process but also opened the door for broader community involvement, increasing accessibility and efficiency.

A central feature of the legislation was the formal establishment of Volunteer Examiner Coordinators (VECs)—organizations designated by the FCC to manage and coordinate the work of accredited Volunteer Examiners (VEs). VECs are responsible for ensuring that examinations are

¹47 CFR 1.41

²Appendix 1, 47 CFR Part 97

³Public Law 97-259

conducted fairly, consistently, and in accordance with FCC rules. They serve a critical role as the official liaison between the Commission and the VEs, facilitating communication, transmitting test results, and overseeing the integrity and uniformity of the examination system nationwide.

This legislative change not only empowered the amateur radio community but also allowed the FCC to focus its resources more efficiently while maintaining regulatory oversight. The success of the VEC program has since become a model for collaborative, community-driven regulatory implementation within the federal government.

While the Commission has no formal rules outlining a filing process that establishes a new Volunteer Examiner Coordinator, we find minimum requirements for service to the amateur radio community⁴. They are as follows:

- (a) Be an organization that exists for the purpose of furthering the amateur service;
- (b) Be capable of serving as a VEC in at least the VEC region proposed⁵;
- (c) Agree to coordinate examinations for any class of amateur operator license;
- (d) Agree to assure that, for any examination, every examinee qualified under these rules is registered without regard to race, sex, religion, national origin or membership (or lack thereof) in any amateur service organization;

Petitioner agrees to the aforementioned requirements to serve as an independent Volunteer Examiner Coordinator and would abide by them without prejudice or malice.

III. DISCUSSION

A. REASONS WHY A NEW VEC IS NECESSARY

As of the date of this writing, there are currently fourteen (14) Volunteer Examiner Coordinators (VECs) operating under written agreements with the Federal Communications Commission (FCC) to administer amateur radio examinations. This figure reflects a substantial decline from the Commission's earlier registry of twenty-eight (28) authorized VECs. While such fluctuation over time may be expected due to organizational shifts, operational challenges, or voluntary

⁴47 CFR 97.521

⁵47 CFR, Part 97, Appendix 2

withdrawal, this reduction occurs at a moment when technological capability, public interest, and demand for efficient examination services have never been greater.

The world has changed—and so have the expectations of the amateur radio community. Advances in digital communications, remote testing platforms, and coordination software have transformed what is possible in the administration of examinations. Yet, despite these advancements, many current VECs have been slow—or in some cases, unwilling—to adapt. This has resulted in inconsistent service delivery, uneven regional access, delayed processing, and a lack of innovation in meeting the diverse needs of today’s examinees.

It is no longer sufficient to rely solely on legacy systems or outdated practices. The amateur service deserves—and increasingly demands—a VEC structure that is responsive, technologically current, mission-focused, and inclusive of all who seek to enter and advance within the service. The Commission has long acknowledged the value of public-private partnership in the form of the VEC system, but that system must evolve to remain effective.

This petition is submitted in recognition of that reality. It sets forth the clear, evidence-based need for the establishment of a new VEC, one committed to excellence, accessibility, and innovation. The reasons for this request are not theoretical—they are practical, measurable, and rooted in the lived experiences of applicants, examiners, and the broader amateur radio community.

The following sections detail the specific justifications for why such an addition is warranted at this time.

i. COVID-19 AND EXAM DELIVERY

In March 2020, the onset of the global COVID-19 pandemic brought about an unprecedented disruption in nearly every aspect of daily life—including the delivery of essential services. The amateur radio community was not immune to these challenges. Practically overnight, in-person amateur radio examination sessions were suspended nationwide, and many Volunteer Examiner Coordinators (VECs) ceased testing operations altogether. What followed was a defining moment

for the future of amateur radio licensing in the United States.

This crisis revealed a fundamental vulnerability in the VEC system: a heavy reliance on traditional, in-person methods that were no longer viable under public health restrictions. But it also demonstrated the resilience and creativity of the amateur radio community. Across the country, local clubs, exam teams, and individual examiners rose to the occasion, exploring alternative methods to ensure continuity in licensing. From this urgency emerged the development and deployment of web-based, remotely proctored examination platforms—a groundbreaking shift that redefined what was possible in amateur radio testing.

Yet, this transformation was not universally embraced. While some VECs quickly adapted, recognizing both the necessity and legality of remote testing—especially in light of the FCC’s comments released in 2020⁶, which explicitly affirmed its permissibility—others resisted, asserting that such methods were either unworkable or unlawful. This divergence in response created inconsistencies across the country, with some aspiring operators having access to streamlined remote testing, while others were left waiting indefinitely due to a lack of local in-person options.

This experience demonstrated beyond any doubt that technological innovation must be integrated into the core operations of any modern VEC. The pandemic served as both a catalyst and a proving ground—revealing not only the feasibility of remote testing, but also its potential to expand access, improve efficiency, and enhance the overall applicant experience. At the same time, it laid bare the limitations of an aging infrastructure and underscored the urgent need for new leadership, new tools, and a renewed commitment to progress. The events of 2020 make it abundantly clear: a new VEC is needed—one founded on adaptability, innovation, and readiness to meet both the current and future needs of the amateur radio service.

⁶FCC Public Notice DA-20-467A1

ii. LOGISTICAL CHALLENGES IN RURAL AMERICA

The prevailing belief that amateur radio license testing in the United States is “widely accessible” is not supported by the lived reality of many Americans—especially those residing in rural, remote, and underserved areas. While accessibility may be reasonably adequate in urban centers and densely populated regions with a strong amateur radio infrastructure, this is not the case for vast swaths of the country. Petitioner respectfully challenges this assumption and contends that the current system falls short of the inclusive, equitable standard that amateur radio should uphold. Take Alaska as a primary example. At 663,268 square miles⁷, Alaska is not only the largest state in the U.S. by area, but also one of the most geographically and logistically challenging environments in which to provide services. The state’s low population density, extreme weather conditions, limited road systems, and high transportation costs create significant barriers to basic access—amateur radio license testing included.

Consider an applicant in Utqiagvik, one of the northernmost communities in the United States. The nearest in-person amateur radio exam session is held in Fairbanks, located approximately 500 miles away by air. A round-trip commercial flight with Alaska Airlines averages \$550, with lodging costing a minimum of \$175 per night, not including food, local transport, or examination fees. For a one-hour written test, this becomes a multi-day, high-cost endeavor that is simply impractical—if not outright prohibitive—for many Alaskans. As a direct result, communities across Alaska remain underserved and underrepresented in the amateur radio service, despite a growing interest and strategic need for qualified operators in remote regions.

The problem, however, is not unique to Alaska. Across the continental United States, many Americans face similar accessibility issues. Rural areas in the Lower 48 States, often many miles from the nearest testing location, are also impacted by geography, economic limitations, and insufficient testing availability. In these cases, examinees are not buying airline tickets—but they are spending hundreds of dollars on fuel, sacrificing entire days to drive to and from exam sites, and bearing the financial and logistical burden of what should be a routine certification process.

⁷<https://en.wikipedia.org/wiki/Alaska>

This is especially burdensome during a time of elevated fuel prices, rising inflation, and an unstable economic climate.

Despite these ongoing challenges, no existing Volunteer Examiner Coordinator has implemented a comprehensive or scalable mitigation plan to reduce these accessibility barriers nationwide. The current VEC framework is not adequately structured to respond to geographic isolation, economic disparity, or emerging demand for remote and flexible testing options. While some VECs have made limited progress with online exam administration, availability remains inconsistent, overly restrictive, or, in many cases, non-existent for rural communities. This is precisely where Petitioner seeks to fill the gap.

The Last Frontier Amateur Radio Society is uniquely positioned and fully prepared to address this inequity through the establishment of a modern Volunteer Examiner Coordinator—one that prioritizes accessibility, remote testing infrastructure, and community-focused service delivery. Petitioner’s model provides a viable, scalable solution to meet the needs of both Alaska and similarly situated regions across the United States. By leveraging technology, streamlining examiner coordination, and removing unnecessary geographic barriers, this proposed VEC would directly support the Commission’s broader goals of promoting inclusivity, enhancing public safety, and expanding the reach of amateur radio.

This petition is not merely a request for recognition—it is a call for meaningful reform in a system that has left too many behind for too long. The time has come to modernize the VEC structure and ensure that no qualified applicant is excluded simply because of where they live.

iii. BANDWIDTH CHALLENGES IN RURAL AMERICA

The emergence of web-based, remote amateur radio testing has fundamentally reshaped how people join the ranks of amateur radio. It has opened new doors for applicants, especially during the COVID-19 pandemic, when in-person testing was often impossible. Yet, as with many technological shifts, the benefits have not been distributed equally. While remote testing was intended

to increase access and flexibility, it has—in practice—left behind a significant portion of the population, particularly those in rural and Tribal areas.

At the heart of this disparity lies the technology itself. The most widely used remote exam platform among VECs is Exam Tools⁸—a robust and powerful web-based testing system adopted by every Volunteer Examiner Coordinator currently offering paperless or remote exams. For individuals living in areas with strong broadband infrastructure and modern computing devices, Exam Tools performs exceptionally well. It requires relatively recent hardware, substantial processing power, and internet speeds often exceeding 50 megabits per second, which are commonplace in urban and suburban environments.

However, for rural Americans, Tribal communities, and those in geographically remote regions, this level of connectivity remains out of reach. According to the FCC’s 2020 Broadband Deployment Report⁹, 22.3% of rural Americans and 27.7% of individuals living on Tribal lands lack access to fixed terrestrial broadband at even 25/3 Mbps—the FCC’s own minimum benchmark for high-speed internet. In stark contrast, only 1.5% of urban Americans face the same limitations. These figures reflect a systemic and growing digital divide, and they directly undermine the accessibility of remote amateur radio testing for millions of Americans. This is where the Petitioner offers a critical and innovative solution.

The Last Frontier Amateur Radio Society has developed and tested an alternative exam platform called Wireless Exam Gen¹⁰. Unlike its broadband-heavy counterpart, Wireless Exam Gen is lightweight—just 10 megabytes in size—and optimized for environments with extremely limited connectivity. It has been successfully tested at speeds as low as 56 kilobits per second, equivalent to the dial-up internet speeds of the late 1990s. This remarkable performance makes it ideally suited for low-bandwidth environments, including remote villages, field sites, and disaster zones.

⁸<https://exam.tools/>

⁹<https://docs.fcc.gov/public/attachments/FCC-20-50A1.pdf>

¹⁰<https://wirelessexamgen.com/>

Even more significantly, Wireless Exam Gen is the first amateur radio exam system designed to function entirely “off-grid.” It runs on a Raspberry Pi mini-computer, preconfigured as a secure, local web server. Connected to a basic wireless router or access point, the system allows Volunteer Examiners and applicants to interact with the exam interface over a local Wi-Fi network—without any reliance on the internet at all. This model is not hypothetical; it has been fully tested, proven in field conditions, and stands ready for immediate deployment. It represents a true breakthrough in exam accessibility and system resilience, particularly in regions where power, internet, and infrastructure are unreliable or nonexistent.

This innovation is not merely technological—it is mission-driven. It embodies a modern interpretation of the public interest obligations of the amateur radio service: to promote education, public safety, emergency preparedness, and access to underserved populations. The current VEC framework, while well-intentioned, was never designed to meet the needs of 21st-century rural America. The system must evolve to serve the entire nation—not just those fortunate enough to live near major population centers with gigabit internet.

The Last Frontier Amateur Radio Society is uniquely prepared to meet this challenge. It has mastered the use of Wireless Exam Gen and developed the logistical and operational framework necessary to support its deployment nationally. By establishing a new Volunteer Examiner Coordinator, Petitioner will deliver a sustainable, scalable, and inclusive testing infrastructure that reaches those whom the current system has left behind.

This is not just a technical solution—it is a matter of equity, access, and modernization. The Commission now has the opportunity to recognize and authorize a VEC that is truly equipped to serve all Americans, regardless of geography, connectivity, or socioeconomic status.

iv. LACK OF SUPPORT TO MODERNIZE BY VEC’s

Since the inception of the Volunteer Examiner (VE) Program in the early 1980s, the world has undergone a radical technological transformation. When the Commission first authorized

VEs through the Goldwater-Wirth provisions of Public Law 97-259, license testing was exclusively paper-based, conducted in person, and processed manually—a reflection of the technological landscape of the time. Americans primarily communicated through postal mail and landline telephones, and information spread through print media, terrestrial radio, and network television. The Commission’s vision for the VE Program was progressive for its time, but it is now incumbent upon all stakeholders to ask: has the program kept pace with modern technological standards and expectations? The answer, in many cases, is a resounding no.

Today, we live in a world of cloud computing, mobile connectivity, professional-grade video conferencing, and real-time data processing. Entire industries have transitioned to paperless systems not only to reduce costs, but also to enhance accessibility, improve efficiency, and better serve public needs. In the world of amateur radio testing, these technologies offer the same promise—and yet, over half of the current 14 active Volunteer Examiner Coordinators continue to rely on outdated, paper-based methods, despite the availability of modern alternatives. Some of these same VECs have outright refused to adapt, citing inertia, resistance to change, or a lack of perceived need. This refusal not only hinders progress, it actively suppresses participation from younger and more technologically inclined demographics, who expect 21st-century solutions when entering a technical, federally regulated communications service.

By contrast, the Anchorage ARC VEC became America’s first fully paperless VEC in June 2020, setting a precedent for what is possible. Petitioner applauds that milestone but notes that very few others have followed. Meanwhile, younger prospective licensees—particularly those under 18—often gravitate toward streamlined, digital-first systems in education, testing, and communication. When these young people encounter antiquated, paper-based systems riddled with delays and manual processes, many simply disengage. The amateur radio service loses valuable new operators before they even begin.

Modernization is not a complex concept—it is a necessary one. Petitioner firmly believes that with proper training, Volunteer Examiners of all ages and technical skill levels can transition to

digital systems. The failure of some VECs to do so is not due to technical impossibility; it is due to institutional reluctance, lack of innovation, and a mindset that resists evolution. Such a mindset is incompatible with the FCC's broader direction, especially given that the Commission itself has successfully implemented paperless systems¹¹ for nearly all wireless licensing and public interaction.

The amateur radio service will not thrive by clinging to outdated workflows. It will grow when the institutions responsible for onboarding new operators are forward-thinking, adaptable, and focused on delivering a better experience. Petitioner respectfully asserts that many of the existing VECs, despite publicly claiming to support newcomers, have fundamentally failed in their mission—not because of malice, but because they have failed to modernize.

The Last Frontier Amateur Radio Society is not only prepared to address this gap—it has already done so. Petitioner has fully implemented a 100% paperless testing infrastructure capable of serving examinees of all ages, regardless of technical ability. With thoughtful design, a supportive interface, and an emphasis on examiner training, digital exam delivery becomes intuitive, not intimidating. The system is not only equitable—it is efficient, cost-effective, and environmentally responsible.

Moreover, through a direct partnership with the Commission, the Last Frontier Amateur Radio Society is ready to immediately deploy a cutting-edge system that delivers:

- Instant exam results, reducing wait times and increasing applicant satisfaction;
- Reduced administrative overhead, resulting in faster data handling and license issuance;
- Scalability and sustainability, with a lightweight digital footprint and minimal equipment requirements;
- Significant cost savings for both administrators and applicants.

This model does not require reinvention—it simply requires authorization. Petitioner is prepared to operationalize this system today, offering a modern, scalable, and responsive solution that aligns with the Commission's public interest mandate and the evolving expectations of the amateur radio community.

¹¹FCC Public Notice WT Docket No. 14-161

The future of amateur radio depends on innovation, accessibility, and a willingness to adapt. The Last Frontier Amateur Radio Society stands ready to lead, with a program that respects tradition but refuses to be bound by outdated limitations. The time to act is now—and this petition is a call to usher in a new era of amateur radio testing for generations to come.

B. PETITIONER’S COMMITMENT TO ALASKA

At the heart of this petition lies a simple but profound truth: Alaska is not just where the Petitioner operates—it is the very foundation of the Petitioner’s mission. The Last Frontier Amateur Radio Society was formed out of necessity, with a vision to bring meaningful, sustainable access to the amateur radio service across Alaska’s vast and often inaccessible terrain. If authorized by the Commission as a Volunteer Examiner Coordinator (VEC), Petitioner will implement a model of service that is geographically aware, culturally respectful, and technologically innovative, with Alaska as the proving ground for a national standard in accessibility.

Alaska is a land of immense geographic scale, often misunderstood by those unfamiliar with its realities. With more than 660,000 square miles, a fragmented road system, limited infrastructure, and hundreds of rural and Tribal communities only accessible by air or water, Alaska poses unique challenges—and opportunities—for the future of amateur radio. At the same time, amateur radio has long served as a critical communication tool in times of emergency or isolation; however, far too many Alaskans remain without access to the testing infrastructure required to enter or progress within the service. Petitioner seeks to change that—permanently.

Through the Last Frontier Amateur Radio Society, Petitioner is actively laying the groundwork for a first-of-its-kind, statewide network of community-based amateur radio examination sites. These locations, strategically placed in partnership with villages, schools, local governments, Tribal councils, and nonprofit entities, will serve not just as testing hubs, but as educational gateways to amateur radio participation, emergency communications readiness, and technical literacy.

This effort is not theoretical—it is already in motion. Petitioner has initiated collaborative dialogues with Alaska’s Native Corporations, Tribal governments, and borough-level agencies to forge partnerships that will support ongoing local engagement, training, and capacity building. These relationships are designed to respect the unique cultural and logistical needs of Alaska’s diverse communities, while ensuring they are not left behind in the digital age. This also ensures that exam delivery is equally accessible to rural Alaskans as it is to residents of urban areas in the Lower 48. Such equity is long overdue.

In addition, the Last Frontier Amateur Radio Society has begun establishing partnerships with Alaska’s major telecommunications carriers to secure reliable, affordable internet service for communities where terrestrial broadband is available. Where connectivity is lacking, Petitioner is exploring and implementing off-grid testing solutions, such as local Wi-Fi testing via the Wireless Exam Gen platform, that eliminate dependence on high-speed broadband. The Petitioner is also working directly with the State of Alaska to support the long-term deployment of technology assets, including infrastructure grants and hardware procurement, to equip some of the most remote villages in the United States with tools that enable residents to take amateur radio exams without leaving their community. But Petitioner’s vision doesn’t stop there.

Recognizing that no single organization can meet this need alone, the Last Frontier Amateur Radio Society is committed to building alliances with other amateur radio clubs and community organizations throughout Alaska, particularly those that do not currently offer license testing. Through these partnerships, Petitioner will empower local volunteers and facilitators to conduct exams within their communities, using familiar technology and culturally competent practices. Whether it’s helping a high school student in a remote village earn their Technician license or assisting an elder ham operator upgrade their privileges without the burden of travel, Petitioner is determined to ensure that every Alaskan has a pathway into amateur radio.

The unfortunate reality is this: Alaska remains one of the most underserved states in the nation for amateur radio license testing. Geographic isolation, high travel costs, limited testing

availability, and technological gaps have all contributed to this disparity. These challenges are not only a barrier to individual advancement—they are a public interest concern, especially given amateur radio’s proven value in emergency response and rural connectivity.

This petition represents a call to action. The Last Frontier Amateur Radio Society stands ready—with technology, personnel, partnerships, and a long-term plan—to serve Alaska in ways no other VEC currently can or does. Suppose the Commission is committed to universal access, national resilience, and the advancement of amateur radio as a public service. In that case, the approval of this petition is not only appropriate—it is essential.

C. PETITIONER’S COMMITMENT TO ALL OF AMERICA

While Alaska presents some of the most extreme examples of geographic and technological barriers to amateur radio license testing, it is far from alone. Across the United States, rural and underserved communities continue to face significant, often insurmountable, challenges in accessing examination opportunities. In countless cases, prospective applicants—eager to join the amateur radio service—are forced to drive hundreds of miles simply to sit for a license exam. These individuals are not lacking in interest, ability, or commitment. What they lack is access—and that, Petitioner argues, is a failure not of the applicants, but of the current Volunteer Examiner Coordinator (VEC) system itself.

With the ongoing rise in fuel costs, economic pressures, and limited public transportation options in rural America, it is unacceptable—and increasingly unreasonable—to expect individuals to travel long distances for a one-hour test. Such requirements disproportionately affect low-income individuals, students, working families, and the elderly, further widening the gap between urban and rural participation in the amateur radio service. These barriers do not just inhibit access—they erode public confidence in the system’s fairness and inclusivity.

Petitioner finds this reality unacceptable. The Last Frontier Amateur Radio Society offers a comprehensive and scalable plan to address these disparities—not only in Alaska, but nation-

wide. The core of this plan is simple, yet transformative: to ensure that any community in the United States—no matter how remote or underconnected—has access to the same quality of examination services as those in major metropolitan areas.

Petitioner's concept relies on a nationwide deployment strategy that enables any public facility—such as a school, library, community center, town hall, or Tribal government building—to serve as a testing site, provided it meets minimal technological requirements. This does not require high-end infrastructure or expensive broadband; Petitioner's tools and protocols are purpose-built to operate in low-bandwidth or no-internet environments, thanks to innovative platforms like Wireless Exam Gen, which can function entirely offline and on low-cost hardware.

Petitioner will work directly with local governments, educational institutions, nonprofits, emergency management agencies, and volunteer examiners across the country to train personnel, install portable testing kits, and empower communities to administer exams independently. This strategy is not theoretical—it is operationally sound, technologically proven, and ready for immediate deployment.

At the heart of this model is a commitment to using every available communication channel—phone, radio, email, postal service, and in-person outreach—to ensure that those with the fewest resources are never left out of the conversation. By bringing exams directly to underserved communities—rather than expecting communities to come to exams—Petitioner will foster a culture of inclusion, growth, and sustainability within the amateur radio service.

Moreover, Petitioner firmly believes that this approach will not only increase initial licensing rates, but will also enhance long-term license retention. When individuals can test in familiar environments—supported by local facilitators—they are more likely to feel welcomed into the amateur radio community. This sense of local ownership and accessibility creates a lasting bond that strengthens the overall health and longevity of the service nationwide.

The Commission has long recognized amateur radio as a vital public service, particularly in times of emergency and disaster. But for amateur radio to fulfill its potential, it must be accessible to all Americans—not just those fortunate enough to live near a test site. The Last Frontier Amateur Radio Society is prepared to lead this national effort, bridging gaps the current VEC system has left unaddressed for decades.

Again, this petition is not merely about expansion—it is about equity, inclusion, and the modernization of a critical public service. Petitioner is ready, willing, and uniquely positioned to deliver this vision to every corner of the nation.

D. PETITIONER'S COMMITMENT TO TRANSPARENCY

At its core, the purpose of a Volunteer Examiner Coordinator (VEC) is to render a public service on behalf of the Federal Communications Commission—a service that should be grounded in fairness, professionalism, and the highest standards of ethical conduct. The VEC framework, as originally envisioned by the Commission, was meant to decentralize exam administration while maintaining the integrity and public trust historically associated with federal regulatory oversight. Yet, in recent years, that trust has been quietly eroded, not by overt wrongdoing, but by a lack of transparency, insufficient financial accountability, and an absence of consistent ethical benchmarks across the current VEC system.

Petitioner submits that transparency is not optional—it is essential. Without it, the public cannot fully trust the processes by which amateur radio license examinations are administered, nor can the Commission confidently rely on VECs to reflect the spirit of service envisioned by Congress when it enacted the Volunteer Examiner provisions in 1982. Despite the vital public service role they play, none of the 14 active VECs today publicly disclose their internal operations or financial practices. Many VECs charge fees for examination services, often citing administrative expenses, mailing costs, or examiner compensation as justification. However, Petitioner believes that, in far too many cases, these funds are used for purposes that extend beyond the reasonable scope of license testing, such as:

- Paying staff or club members for tasks that should be performed voluntarily or with minimal reimbursement;
- Using testing revenue to pay rent for club-owned properties;
- Covering unrelated expenses such as social functions, meals, or discretionary purchases.

These practices, while perhaps permissible under the current regulatory structure, fail the fundamental test of public accountability. The amateur radio community deserves more. The Commission deserves more. The public, whose trust underpins the entire licensing system, deserves more.

Petitioner is prepared to set a new standard—one that is long overdue. The Last Frontier Amateur Radio Society commits to becoming the first and only VEC to implement voluntary, independent financial audits on an annual basis, even in the absence of any federal directive. These audits will be:

- Conducted by a qualified third party with no organizational ties to Petitioner;
- Published in full on a publicly accessible website, freely downloadable, viewable, and distributable by any member of the public;
- Accompanied by plain-language summaries for ease of understanding by those unfamiliar with financial statements;
- Linked directly to itemized expense records, demonstrating exactly how funds are received, managed, and allocated.

This transparency initiative is not merely a procedural reform—it is a declaration of principle. It is a recognition that public service, especially when performed under the authority of the federal government, must be subject to public scrutiny. The amateur radio community entrusts VECs with a gatekeeping function over entry into a federally regulated service. That trust must be earned, not assumed.

Petitioner firmly believes that clear, honest, and transparent financial stewardship will increase public confidence, attract new applicants, and demonstrate that amateur radio license testing is not a commercial venture—but a community-driven responsibility rooted in ethics and service.

No current VEC has implemented such transparency. Most have not even entertained the possibility. Petitioner respectfully submits that this lack of accountability has gone unchallenged for too long—and that now is the time for change.

If authorized by the Commission, the Last Frontier Amateur Radio Society will lead by example, demonstrating that integrity, transparency, and fiscal responsibility are not burdens—they are the foundation of trust. And trust is the only acceptable currency in a system built to serve the public good.

E. PETITIONER’S PLAN FOR EXAM FEES AND SUBSIDIZED TESTING

In alignment with the foundational purpose of the Volunteer Examiner Coordinator (VEC) program—to promote access, inclusivity, and public service within the amateur radio community—Petitioner proposes a forward-thinking initiative that directly gives back to those who serve our nation and represent its future: subsidized amateur radio license examinations.

This is not merely a gesture of generosity; it is a deliberate, mission-aligned act that honors public service, cultivates youth engagement, and strengthens the amateur radio service for decades to come. While commonly referred to as “free,” such examinations are more accurately described as subsidized—funded through a combination of operational efficiencies, community contributions, and intentional resource allocation by the Petitioner.

There is no such thing as a service that is entirely free of cost; someone, somewhere, bears that cost. Petitioner acknowledges this reality and embraces it with purpose: to assume that burden on behalf of those who have sacrificed, served, or aspire to shape the future.

Petitioner proposes to subsidize all amateur radio examinations—initial or upgrade—for the following individuals:

- Active duty members of the United States Armed Forces
- Veterans of the United States Armed Forces
- Active Law Enforcement Officers

- Active first responders (EMTs, paramedics, firefighters)
- Applicants who are under the age of 18

Each of these groups represents a uniquely vital segment of American society—either by safeguarding national security and public safety or by representing the future of amateur radio. To ignore the distinct needs and contributions of these individuals is to forfeit an opportunity to empower the very people most likely to benefit from and enrich the amateur radio service.

Members of the military, law enforcement, and first responder communities risk their lives daily in service to this nation. Their sacrifices go far beyond personal inconvenience; they endure long deployments, physical danger, psychological stress, and time away from family in the name of public duty. For many of these individuals, amateur radio represents a lifeline to community, education, and a constructive hobby that supports public service through emergency communications and technical learning.

It is both a privilege and a moral responsibility to give back to these selfless Americans through subsidized examinations. In fact, many veterans—particularly those who are disabled or in transition from active service—actively seek out amateur radio as a therapeutic, educational, or service-oriented outlet. By removing the financial barrier to licensure, Petitioner affirms a powerful message: those who served their country should not have to pay to continue serving it through amateur radio.

The Petitioner also identifies a critical demographic whose engagement is essential to the long-term survival of the amateur radio service: America's youth. With fewer young people entering the hobby today compared to previous generations, intentional outreach and financial support are critical.

Children and teenagers who show an interest in amateur radio are demonstrating a rare curiosity—one that leads to future careers in engineering, emergency management, science, cybersecurity, and telecommunications.

To impose a financial burden on minors—many of whom do not earn their own income—signals disinterest in cultivating tomorrow’s innovators. Petitioner categorically rejects that premise. Instead, the Last Frontier Amateur Radio Society stands firm in its belief that youth should be empowered, not discouraged, by the licensing process. A subsidized exam removes barriers, opens doors, and creates a positive first impression of the amateur radio service—one that may lead to lifelong involvement.

This subsidy initiative is not rooted in idealism alone. It is both operationally achievable and strategically sound. Through the use of low-overhead, paperless platforms (such as Wireless Exam Gen), cost-effective exam delivery, and transparent financial practices, Petitioner can sustainably fund subsidized exams while maintaining the integrity of the testing program.

Unlike traditional models that depend on opaque fee structures or surplus revenue for unrelated activities, Petitioner’s model is grounded in clear priorities, community partnership, and public accountability. Any exam fees collected from the general population will be clearly earmarked to help offset the cost of subsidized exams for eligible individuals, ensuring that the public understands how every dollar is used in support of service. At a time when trust in institutions is waning and participation in amateur radio is stagnating, Petitioner’s commitment to service through subsidized examinations is both a moral imperative and a strategic necessity.

This initiative exemplifies the spirit of amateur radio; voluntary service, community advancement, and technical empowerment, and reflects the highest ideals of what a VEC should be. If granted recognition as a Volunteer Examiner Coordinator, Petitioner will establish a new precedent—one in which gratitude, responsibility, and opportunity converge to create a more inclusive and impactful amateur radio service.

F. PETITIONER’S PLAN TO SERVE THE DISABLED

The Petitioner pledges that under the Last Frontier Amateur Radio Society, no applicant with a disability will ever be made to feel like a burden or an afterthought. Accessibility is not a fa-

vor; it is a right. In fact, it is a matter of public trust and regulatory obligation. Understanding the Commission's guidelines in this matter¹², Petitioner is prepared to implement immediate and long-term practices to ensure that persons with disabilities are not only accommodated, but are welcomed, supported, and championed throughout every phase of the licensing process.

Among these practices:

- Use of a fully ADA-compliant examination platform, such as Wireless Exam Gen that seamlessly integrates with screen readers, alternate navigation devices, and other assistive technologies, meeting or exceeding the requirements of 36 CFR Part 1191.
- Real-time accessibility features, including zoom capabilities, alternate contrast modes, keyboard-only navigation, voice-based interfaces, and optional read-aloud features, to meet the unique needs of those with low vision, limited dexterity, or neurological impairments.
- Flexible delivery methods, including remote proctoring and in-home examinations for individuals with limited mobility or transportation barriers, executed with professionalism and care.
- Customized accommodations such as extended time, alternate communication modalities (e.g., ASL interpreters, captions), and sensory-friendly sessions for applicants with autism, cognitive processing disorders, or PTSD.
- Direct communication pathways for applicants to request accommodations confidentially, easily, and without fear of being denied or judged.

These measures will not be theoretical. They are already being built into Petitioner's operational framework and will be deployed as a core part of the VEC's charter from day one.

Petitioner also recognizes that systemic exclusion often stems not from inadequate technology but from poor leadership, insufficient oversight, and a culture that prioritizes convenience over compassion.

Petitioner therefore commits to the following non-negotiable policies:

- Zero tolerance for any Volunteer Examiner (VE) team that fails to appropriately serve a disabled applicant—whether through neglect, delay, dismissiveness, or outright refusal. Such behavior will result in immediate retraining or revocation of credentials under Petitioner's authority.

¹²47 CFR 97.509(k)

- Mandatory accessibility and sensitivity training for all affiliated VE teams to ensure they understand not only the letter of the law, but the spirit of inclusion and respect that must guide their conduct.
- Establishment of a dedicated Accessibility Officer to oversee disability-related exam requests, mediate applicant concerns, and develop continuous improvements to service delivery.
- Public reporting mechanisms where individuals can safely report exclusionary behavior or barriers without fear of retribution, ensuring full accountability and transparency.

Petitioner’s long-term vision extends beyond Alaska or even the continental United States. Petitioner intends to build a globally scalable model for accessible amateur radio testing—one that can serve as a benchmark for other VECs and institutions seeking to modernize their approach to disability access.

By embracing the best assistive technologies, fostering community partnerships with disability advocacy groups, and remaining vigilant in identifying new barriers and opportunities, Petitioner is uniquely positioned to lead an inclusive revolution in amateur radio examination delivery.

This is not simply a legal obligation. It is a moral one. Amateur radio has always prided itself on being a service for everyone—capable of connecting those separated by distance, disaster, and disability. Petitioner believes it is time the licensing process reflected that same inclusive spirit.

G. RESTORATION OF HONESTY AND INTEGRITY IN VEC PROGRAM

One of the most pressing and under-addressed crises within the amateur radio service today is the degradation of honesty and integrity in the administration of license examinations. Petitioner contends that, far too often, the fundamental trust placed in the Volunteer Examiner system is being eroded by instances of fraud, negligence, and complicity—all of which threaten not only the legitimacy of individual licenses, but the credibility of the entire regulatory framework under Part 97 of the Commission’s Rules.

There are numerous documented cases where entire Volunteer Examiner (VE) teams have been expelled by one Volunteer Examiner Coordinator (VEC) for unethical conduct, only to be quietly absorbed by another, allowing illicit activities to continue unimpeded. Such conduct includes, but is not limited to:

- Assisting examinees by providing answers during examinations;
- Allowing unqualified individuals to take exams on behalf of others;
- Selling licenses outright to individuals unwilling or unable to meet even the minimum standards of technical competence;
- Failing to maintain secure chains of custody and data integrity in exam materials;
- Violating §97.509(e), which mandates immediate revocation of VE credentials for failure to comply with Commission regulations.

In each of these cases, the regulatory environment is intentionally subverted, not out of ignorance, but out of a dangerous belief that enforcement is unlikely and accountability is optional. This must end.

The Last Frontier Amateur Radio Society was formed not as a competitor in a crowded VEC space, but as an ethical vanguard: an organization with the singular mission of restoring public trust, regulatory compliance, and personal responsibility to the heart of amateur radio licensing. Petitioner understands clearly that VECs operate with delegated authority from the Federal Communications Commission. That authority must be exercised with the highest level of fiduciary responsibility and moral clarity.

Petitioner pledges to implement a zero-tolerance policy toward any VE team or examiner found to be engaging in unethical behavior, including:

- Permanent disqualification and immediate decertification of any VE engaged in fraudulent activity;
- Public disclosure of decertified teams and a transparent justification for their removal;
- Reporting of misconduct directly to the Commission for further regulatory action under §97.509(e);

- Sharing of data with other VECs to prevent unethical teams from “VEC-hopping” to continue their misconduct;
- Mandatory annual integrity audits, overseen by an independent board of governance, with published results made available to the public.

Petitioner believes that honesty and integrity are not abstract ideals—they are actionable standards. They must be taught, reinforced, and demanded at every level of operation. This is especially critical in an environment where exam administration often happens remotely or without direct FCC supervision.

The amateur radio service has always held itself out as a self-regulating body of technically competent, ethically grounded individuals. But if the process by which we admit new operators becomes corrupted, that promise collapses. It threatens the safety of emergency communication networks. It diminishes the public’s confidence in the amateur radio community. And it directly undermines the Commission’s goals for a fair and lawful service.

Petitioner therefore makes the following binding commitments:

- All exams will be conducted with full adherence to the letter and spirit of 47 CFR §97.509, regardless of delivery method or location.
- Each VE will undergo ethics training as a prerequisite to activation, and will sign an annual reaffirmation of the VEC’s Code of Conduct.
- Audit trails will be built into every session, including randomized compliance checks and post-session reviews.
- Any report of impropriety will be investigated fully and without delay, with the Petitioner reserving the right to suspend individuals immediately during the investigation.
- All VE team appointments will be based not just on technical competence, but on character, professionalism, and demonstrated accountability.

The Petitioner does not make these declarations lightly. This initiative is born of a sober recognition: if the amateur radio community cannot police itself, the Commission may be forced to intervene more aggressively—thereby weakening the trust that the Volunteer Examiner system was founded upon.

The Last Frontier Amateur Radio Society offers itself as a trusted partner to the Commission in reversing this decline. Petitioner’s militant adherence to integrity is not borne out of rigidity, but of necessity. The only way to preserve the public service mission of amateur radio is to re-establish a culture where ethics are non-negotiable and where those who violate the public’s trust have no place within its structure.

Let the record reflect: Petitioner stands prepared to lead that reform—with transparency, discipline, and unshakable commitment.

H. PETITIONER’S COMMITMENT TO YOUNG LEADERSHIP

One of the most regrettable, yet widely acknowledged, failures of today’s amateur radio service is the chronic neglect of youth involvement, particularly in its systems of leadership, training, and examination delivery. While the service was once a fertile ground for curious young minds to explore science, technology, and public service, it now faces a harsh and dangerous reality: we are aging ourselves into obsolescence.

Nowhere is this crisis more visible than within the current structure of the nation’s 14 active Volunteer Examiner Coordinators (VECs). The majority of these organizations operate with leadership bodies that are not only older demographically but institutionally resistant to change. Most notably, they have consistently failed to embrace the technological progress needed to keep the amateur radio service relevant and accessible to a new generation.

Petitioner finds that many VECs:

- Openly oppose or delay the adoption of paperless testing, despite being provided the tools, guidance, and platforms necessary to make a seamless transition;
- Actively resist the implementation of remote testing, often citing unsupported legal concerns that have already been clarified by the Commission in Public Notice DA-20-467A1;
- Operate under entrenched ideologies that dismiss the contributions, insights, and innovations of younger participants as nonessential or even disruptive.

This mindset does not reflect the adaptive spirit that once defined amateur radio. It is not the approach of a community preparing for longevity—it is a path toward irrelevance.

Petitioner brings not just a different approach—but a radical and long-overdue realignment of purpose. We firmly assert that the future of amateur radio lies with our youth, and that a new generation must be both invited and empowered to shape the direction of examination delivery, licensing standards, and service administration. Anything less than full and intentional integration of youthful voices at every level of VEC operations would represent a moral and operational failure.

Petitioner affirms the following as core commitments to ensure the advancement and preservation of amateur radio through generational succession:

- **Youth Integration in Governance:** Petitioner will reserve leadership seats within its VEC structure for individuals under the age of 30, ensuring that decisions affecting the future are made by those who will live it. Youth advisory panels will inform all policy and innovation directives.
- **Modernization as Standard:** All examinations under Petitioner’s coordination will be administered using digital platforms by default. Paper-based tests will be the exception, not the rule, and only used when accessibility demands it.
- **Remote Testing Advocacy:** Petitioner will fully embrace and expand remote testing capabilities in accordance with the Commission’s 2020 Public Notice, and will work to ensure secure, scalable, and equitable access for examinees in both urban and rural environments.
- **Mentorship Pipeline:** Petitioner will launch an initiative to recruit, train, and certify young Volunteer Examiners, beginning as early as age 18, to create a sustainable VE corps capable of servicing the nation’s growing demand for license testing.
- **Innovation Incubator:** A youth-driven working group will be established to develop, test, and implement new tools and workflows for examination delivery, including AI-assisted accommodations for disabled users, multilingual test options, and modular remote proctoring systems.

The Commission need not look far for warning signs. Licensing numbers are plateauing or declining in certain age demographics. Clubs are closing. Repeat exam candidates—especially young ones—are increasingly discouraged by outdated methods, inaccessible locations, or

unfriendly examiners who are disconnected from the realities of modern learners. If the current VEC structure continues to marginalize innovation and sideline youthful leadership, amateur radio as we know it will not survive another generation. The time for hand-wringing and nostalgia is over. The time for purposeful action is now.

Petitioner sees the inclusion of young minds not as a checkbox for diversity or outreach, but as a cultural cornerstone of everything we do. Petitioner pledges to model a new culture of collaboration, where veteran examiners serve as mentors rather than gatekeepers, and where the voices of today's youth—technologically fluent, globally connected, and deeply passionate—are recognized not as a threat, but as a vital resource.

This is not merely idealism. It is a strategic necessity. No other VEC in existence has made this commitment. No other VEC has built a structure with long-term youth integration embedded in its framework. No other VEC has accepted the hard truth that failing to empower the next generation is equivalent to abandoning the service entirely.

Petitioner respectfully urges the Commission to see this effort for what it truly is: a generational investment in the future of amateur radio, built on inclusion, integrity, and innovation. The Last Frontier Amateur Radio Society does not seek merely to administer exams—it seeks to reignite the imagination of young minds and return the amateur radio service to the forefront of public interest and technical advancement.

This mission can only succeed if it begins now, and if it is led by those who will inherit its outcomes. Let the next generation be welcomed not in name only, but in action, responsibility, and voice. Let us lead that charge.

IV. CONCLUSION AND REQUESTED RELIEF

The Last Frontier Amateur Radio Society submits this petition with earnest resolve, technical readiness, and a deeply rooted sense of civic responsibility. At a time when the amateur radio community stands at a crossroads—facing both the challenges of declining engagement and the

opportunities of modern innovation—LFARS represents a bold and necessary evolution in the Volunteer Examiner Coordinator (VEC) landscape.

Over the course of this petition, we have articulated not only the operational need for a new VEC, but also a moral and strategic imperative. Through detailed evidence and compelling justification, we have demonstrated:

- That existing disparities in access, particularly in Alaska and rural America, are inhibiting entry into the amateur radio service and undermining the FCC’s mandate for universal opportunity;
- That the failure of over half of the currently active VECs to modernize, embrace paperless and remote testing, and reach underserved populations is a disservice to the amateur radio community and the public at large;
- That LFARS brings to the table proven, field-tested, low-bandwidth exam delivery systems, including Wireless Exam Gen—capable of functioning in both connected and fully off-grid environments;
- That we are committed to full accessibility for the disabled, equity for youth, and support for veterans, first responders, and active military members through subsidized examinations and tailored delivery;
- That transparency, fiscal integrity, and regulatory compliance will define our culture, including voluntary annual financial audits and a zero-tolerance policy for unethical behavior by Volunteer Examiners;
- And finally, that LFARS will foster generational renewal by actively recruiting, mentoring, and empowering youth to take leadership roles in examination administration and public service.

These are not baseless aspirations. They are operational realities—ready to be deployed today. The Last Frontier Amateur Radio Society is not petitioning to replicate the status quo. We are offering the Commission a VEC that is built from the ground up to reflect 21st century values: accessibility, accountability, innovation, and service. We are not asking for an opportunity for ourselves—we are advocating on behalf of the thousands of Americans who continue to be underserved or overlooked by the current system.

With this petition, we are prepared to raise the bar for what a Volunteer Examiner Coordinator can and should be. We respectfully ask the Commission to grant LFARS formal recognition as America's next VEC—not simply to add another option, but to restore faith in the system, expand access to all communities, and ensure that amateur radio remains a vibrant, relevant, and resilient public service for generations to come.


Let this be the moment where a new standard is set—where tradition meets progress—and where the future of amateur radio is made brighter, more inclusive, and more effective than ever before.

V. CERTIFICATION BY THE BOARD OF DIRECTORS

THIS PETITION TO ESTABLISH A VOLUNTEER EXAMINER COORDINATOR IS HEREBY SIGNED AND DATED by the Board of Directors for the Last Frontier Amateur Radio Society, Inc. on this 4th day of September, 2025 at Palmer, Alaska.

[SIGNATURES ARE ON THE NEXT PAGE.]

Signed by:



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Brandin Hess, WB1BR

President

Signed by:



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Grant Williams, K4UUQ

Vice-President & Treasurer

Signed by:



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Daniel Purgert, AD8GC

Secretary

Signed by:



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Charles Andrews, W5AD

Director

Signed by:



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Dennis Cleverly, K5DSC

Director

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