

The following *italicized* text is from the FCC's Report and Order adopted on 16 September 2020.

Today, we finalize our transition to electronic interactions for licenses in the Wireless Radio Services - a transition that began more than two decades ago. By doing so, we decrease the costs for consumers and the Commission, enhance transparency of and access to data, significantly improve administrative efficiency, and save a substantial amount of paper annually - to the benefit of the Commission and those who interact with these systems alike.

Finalizing the Commission's transition to an electronic-only ULS and ASR, and reducing the paper created by other systems, requires us to take several remaining steps.

a. First, we remove the remaining exemptions to mandatory electronic filing in ULS and require electronic filing in the ASR System.

We find it in the public interest to eliminate the exemptions in section 1.913 of our rules that allow manual filings by applicants and licensees, and we instead mandate electronic filing for all Wireless Radio Services.¹⁵ This action furthers several longstanding Commission goals, including reducing regulatory burdens and environmental waste while streamlining our wireless services application process. It is also consistent with our Commission-wide efforts to digitize our systems and create efficient, user-friendly interactions with the agency.

What this means:

1. Licensees in the Amateur Radio Service may no longer mail an application for any purpose to the FCC. All applications pertaining to an amateur radio license must be submitted electronically on-line or through a VEC.
2. VEs and VECs might see a slight increase in applications for Renewals and Administrative Updates.
 - a. The FCC receives through the US Postal Service, about 100 applications per month to update a license and/or to renew a license. That's about 7 per month per VEC if they were equally distributed. That's not a huge number.
 - b. Any influx of applications for Administrative Updates and/or License Renewals will probably be due to the following:
 - Some licensees won't get the word about these changes and when their mail-in application is returned, they will rush to their local VE team for help.
 - Some licensees will choose not to do anything online and will visit their local VE team.

b. Second, we require electronic filing of pleadings related to Wireless Radio Services licenses and applications in these systems and require electronic service where service of such pleadings is required.

We find that requiring electronic filing of pleadings will provide several benefits to wireless licensees, applicants, and stakeholders, including cost savings, convenience, and speed. Electronic filing reduces paper, printing, and delivery expenses. It also is more convenient: users can file documents nearly 24 hours a day, 7 days a week through the non-docketed pleadings module on the ULS homepage. In addition, electronic filings are transmitted nearly instantaneously,

which facilitates faster communications with the Commission and makes those pleadings simultaneously available to other interested parties. Electronic filing also allows users to create a digital record and establish proof of delivery.

The record demonstrates that the vast majority of our systems' users have the resources to submit and receive documents electronically, and we find that it is neither burdensome nor cost-prohibitive to mandate electronic filing of pleadings at this time.

What this means:

1. Licensees in the Amateur Radio Service may no longer mail a pleading for any purpose to the FCC. All pleadings pertaining to an amateur radio license must be submitted electronically.
2. This will have no impact on VEs and VECs.

c. *Third, we require that all applicants, licensees, and registrants in the Wireless Radio Services include at least one valid e-mail address on the relevant FCC Forms.*

We find it in the public interest to require the inclusion of e-mail addresses for all new ULS and ASR applicants and all existing ULS licensees and ASR registrants that modify, renew, or otherwise touch their existing licenses and registrations. We encourage existing licensees and tower owners to update their licenses and registrations with an email address in order to receive electronically courtesy letters from the Commission going forward.

This approach is consistent with the Commission's efforts to modernize its legacy filing, communications, and information retention systems and is necessary to effectuate the rules we adopt today requiring electronic delivery of all correspondence between the Commission and ULS and ASR applicants and registrants.

We find that requiring an e-mail address on applications is appropriate and timely given widespread technological developments that have occurred since implementation of ULS. We also find that requiring an e-mail address is not unduly burdensome for applicants and licensees.

As proposed in the Notice, once an e-mail address is required on the relevant FCC Forms, the Commission may dismiss as defective an application if an e-mail address is not included. Section 1.934 of the Commission's rules permits dismissal of an application as defective if it is "incomplete with respect to the required answers to questions." Thus, once inclusion of an e-mail address is mandatory under our rules, it will become a required application component.

We find that we should amend section §1.923(i) to require the inclusion of an e-mail address on all applications.

We also amend §1.5 of the Commission's rules, which requires licensees and applicants for a license to provide the Commission with an address where the Commission can direct correspondence. Specifically, we revise this rule to also require inclusion of an e-mail address where the Commission can direct correspondence with regard to applicants and licensees in the wireless radio services.

Section 1.947, as amended, further requires that licensees notify the Commission within 30 days of updating an email address of record. We find these sections are sufficient to ensure applicants and licensees keep their e-mails up to date. Just as applicants and licensees are obligated to update

their mailing addresses when that information changes, they will likewise be required to update their e-mail address under this rule to ensure that they receive electronic correspondence from the Commission.

Although §1.947 of the rules allows minor modifications to be made up to 30 days after implementing such changes, any notice sent to the e-mail address currently on file will be deemed to have been served.

What this means:

1. Applicants and licensees in the Amateur Radio Service must provide an e-mail address to the FCC.

a. If an application does not include an e-mail address, the application will be rejected by the FCC with an applicable error code.

b. Licensees are required to keep their e-mail address up to date just like their mailing address. If any notice is sent to an e-mail address previously provided and no longer valid, the FCC's position is that it was delivered. The fact that the applicant/licensee provided a bogus e-mail or has an out-of-date e-mail address on file with the FCC, is not the FCC's problem.

2. **Effective 1 January 2021, applicants at any exam session coordinated by the Laurel VEC will be required to provide an FRN and an e-mail address.**

a. VEs will have to remind applicants of this requirement, as applicable.

b. VEs must continue to ensure that all data entered into SessionManager is accurate.

d. *Fourth, we shift from U.S. Postal Service to electronic delivery of correspondence generated from these systems to applicants, licensees, and registrants in the Wireless Radio Services.*

By this Report and Order, the Commission adopts rules mandating electronic delivery for all ULS and ASR compulsory and courtesy correspondence and eliminating the ability to request the Commission to mail hard copies of authorization and letters. We find it in the public interest to transition to electronic correspondence, which reduces regulatory burdens and environmental waste and makes interactions with the Commission more accessible and efficient.

Mandating e-correspondence and eliminating the ability to request that Bureaus mail hard copies of authorizations produces several benefits with no offsetting costs, given that users can access and download their official authorizations, leases, registrations, and all related correspondence from the ULS and ASR System at any time.

What this means:

The FCC will no longer mail correspondence to applicants and licensees in the Amateur Radio Service. If an application does not include an e-mail address, the application will be rejected by the FCC with an applicable error code. There may some exceptions to the mandatory electronic delivery of correspondence. Also, personal settings in ULS that allow a licensee to request a hard copy document will be disabled.

e. **And finally, we set a transition deadline of six months for these changes to take effect.**

As of the effective date of this Order, we will no longer print and mail paper authorizations. All notification preferences will be automatically set or reset to receive electronic licenses, and all licensees can download and print official copies of their licenses in ULS License Manager. We otherwise set a transition deadline for the decisions today regarding mandatory e-filing, mandatory e-mail address submission, and the Bureaus' shift to electronic correspondence, of six months from the effective date of this Report and Order.

We believe that this deadline provides more than sufficient time for licensees and applicants to prepare and change their practices, if needed. We expect there will be no impact for the vast majority of users, due to the nearly universal adoption of the electronic filing capabilities in ULS and ASR that exist today. Similarly, electronic correspondence is widely embraced as the leading business communication tool, and a transition should be easily accomplished.

Absent a waiver, any manually filed applications for wireless services submitted after the transition deadline will be dismissed without prejudice, and any service not effectuated electronically will be deemed ineffective. [Translation: Unless a waiver is granted in advance, any application submitted by mail after the effective date of the R&O will be dismissed.]

What this means:

1. The implementation date is unknown at this point.
 - a. As of 4 December 2020, the R&O has not been posted in the Federal Register.
 - b. If the Report and Order is posted in the Federal Register in December it will become effective sometime in June 2021. If the R&O is posted in January it will become effective in July 2021.
2. When the effective date of the R&O is determined, the VEC will notify teams.
3. Notwithstanding the eventual effective date of the R&O, **the Laurel VEC will require all applicants to provide an FRN and an e-mail address effective 1 January 2021.**