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BULLETIN!

New Orleans, La., September 21, 1938.

The following is a copy of the A.P.C.O.'S. brief presented to the Chairman of the Informal Hearing held in Washington, D.C., September 14th and 15th:

Mr. Chairman and Members of the Commission, my name is Maurice B. O'Neil. I represent the Associated Police Communication Officers as their President. I hold a First Class Radio Telegraph License, Number T-8-318 with First Class Telephone endorsement, issued at New Orleans, La. July 17, 1936.

The Officers and members of the Associated Police Communication Officers or in accord with the brief submitted to the Commission on July 12th, 1938. Without going into the details, which are already part of the record of this hearing, I wish to respectfully submit the following changes for consideration:

160.01

We cannot emphasize too strongly, our objection to the 3rd., Class Radiotelephone license, as it now stands and further concessions regarding it as contained in the proposed rules. We feel that the original order of the Commission, which established this class of license, and the subsequent order removing the power limitation have caused irreparable damage to be done to professional radio operators. To call a man a radio operator who passes a few simple rules and regulations, cheapens beyond expression, the entire profession. Many who are not familiar with radio operating procedure but are in a position to pass judgment on the hiring of police radio operators, believe that a man holding an operator's license, Third Class, must be a radio operator.

Taking, therefore, the statement of the Commission as found in Bulletin No. 28241 which reads as follows :
" The new rules are intended ----- to raise the standard of operators licenses," we assume that this is your intention. Police Communication Officers who are holders of the highest grades of both radiotelegraph and radiotelephone licenses are anxious to see this class of license placed under a classification that will distinguish the trained radiomen from those who are employed to give announcements over the regular police radio systems.

*The 1938 Convention of the A. P. C. O. will be held at Houston, Texas
October 19 to 22 Inclusive*

We believe, as has been previously stated in the Associated Police Communication Officers brief, previously filed with the Commission, that there is a definite need and place for men holding Third Class Radiotelephone licenses in the police and other services. This has been definitely established and we feel is a necessity to the general safety of the public. However, we recommend that the following changes be made in the paragraph numbers as follow:

160.01 The classes of professional operator licenses issued by the Commission are:

a. Radiotelephone group.

(1) Radiotelephone PERMIT.

164.01 Applicants for original licenses will be required to pass examinations as follow:

a. Radiotelephone PERMIT.

(1).....OK.....

(2) A written examination comprising examination elements one as proposed. The employers opinion as to the operators clearness of speech should be sufficient regarding his employment. Police Department operators are sometimes used to do office work at their stations.

166.01 a. Radiotelephone PERMIT.

Any station of fifty watts power or less while using type A-3 or A-4 emission provided that ;

(1)OK.....

(2)OK.....

(3) Any needed adjustments of the transmitter----- that may effect the proper operation of the station are periodically, or during emergencies, made by an operator regularly employed by the station holding a First or Second Class license, either telephone or telegraph.

169.01 Only employees of the Commission may be authorized to conduct examinations.

164.01 Radio telegraph operator Second Class.

(1) Transmitting and receiving code test of Twenty code groups per minute.

161.02 We believe that this paragraph should be changed to permit Police radio telegraph operators to secure First Class Radio Telegraph Licenses. As it now is written, the word COSTAL prevents this group of radio telegraph operators from acquiring this higher grade of telegraph license. We believe that the experience required in Police Inter-city telegraph stations, both as to speed and technical ability is equal to, if not greater than the qualifications usually expected in the average ships radio station.

169.02 General objection of the officers and members of APCO has been raised to this paragraph. It is our opinion that the Commission is placing an unneccessary burden upon the operator on duty at the time an inspection is made. We feel that every conscientious operator will do everything in his power to see that the radio transmitter he is operating complies with the rules and regulations. This paragraph of the proposed changes places an operator in a decidedly unsafe position.

164.05 We believe that the borderline^{cases}/mentioned in Bulletin No.
164.06 28241 could easily be eliminated in the following manner.

(1) An operator who has three or more years service on his license will be entitled to a renewal of his license without an examination.

(2) An operator, who has less than three and not more than one year of service will be entitled to a renewal of his license upon the successful completion of an abridged examination in the class of license he holds.

(3) An operator who has less than one year on his service record will be required to be re-examined for the class of license he seeks.

In the matter of doubtful service records, it seems to us that it would be a relatively simple matter to grant permission to Radio Inspectors the right to look into the facts contained on doubtful service records. At his periodic examination of various radio stations the Inspector is aware of whose license is among those on the wall in the station. He merely has to include them in his report to be available for future reference.

We believe that all service records, if sworn to before a notary public as being true would furnish sufficient basas to either: renew the license or prosecute under a new law or existing one for falsifying answers to a federal document.

We believe, that now, as never before, experienced and well qualified radio operators only, should be entrusted with the technical duties incident to the successful operation of any radio station. This is especially true in police service where the safety and protection of the lives and property of more than one hundred million people in the United States is effected.

The Associated Police Communication Officers and members have no objections to paragraphs not mentioned.

160.01 Under cross-examination by the Chairman and Members of the Commission, the following facts, as near as can be recalled from memory, were given:

In regard to A.P.C.O.'S. recommendation that the Radio-telegraph Third Class License be changed to that of Radio-telephone Permit or some designation that would avoid this class of license being generally thought of as being on a par or nearly so with that of higher grade licenses. I was questioned by the Commission as to the advisability of changing the color of the license. This I objected to because it is the name and not the color that general objection of A.P.C.O. members have raised against this class of license. I explained during the cross-examination that it is the men who are holding first ~~or~~ second class licenses that must maintain and operate the vast net-work of police radiophone and radio-telegraph stations. I pointed out that these men are charged with great responsibilities and felt as they do that the term "License" as applied to the present radio-telephone Third Class License, should be changed. Upon further cross examination, regarding the reaction of holders of this class of License to the proposed change, I answered that I saw no reason for any, due to the following facts: First, generally speaking, men who hold the Third Class Radio telephone license are only concerned with complying with the Commission's ruling. The holders of such licenses seldom care to advance themselves and secure the Second Class License. If they are enthusiastic enough it was pointed out that, regardless of the name of the license, they would study for a higher license indicating their interest in radio development. On the other hand, those who have obtained a Third Class License, merely to operate equipment assigned them, would not object to the proposed changes. The importance of the change suggested was pointed out as a step in the right direction to raise the present standard of professional radio operators.

In regard to power limitation, "any station of 50-Watts power or less, while using type A-3 or A-4 emission, etc.," I stated that any department equipped with a costly transmitter would be benefitted by employing at least one man with a First or Second Class License, capable of repairing the transmitter in emergencies. Any department large enough to operate equipment of 100-Watts or more would assure themselves against breakdowns of long duration by the employment of at least one skilled operator.

161.02 Upon cross-examination, the Chairman mentioned present restrictions which prevent police radio telegraph operators securing a First Class Radiotelegraph License on their service records. The facts stated by the Chairman were known and understood by me before presenting this proposed change; however, the opportunity of presenting the foregoing testimony before the Commission was an ideal place to lay the cornerstone that we hope will enable police operators and those in similar services to obtain the highest grade radio telegraph license. The Chairman pointed out that we do not listen-in on the distress band while carrying on inter-city police service, also that we do not carry on international radio telegraph work. As to the international telegraph work, I mentioned the fact that New Orleans is applying for an international license for the police service. To meet other requirements of the Treaty, I believe our service can be readily adjusted. Other paragraphs and parts of the brief were presented without cross-examination of any great interest. In general it remained as read into the record to complete the A.P.C.O.'S. brief.

There is no doubt the hearing has brought out many points of interest to members of the A.P.C.O. While I am unable at this time to make any statement as to the effect of changes that might result from the hearing, I can say that I feel certain a lot of good will come from it. Officers of other associations who appeared at the hearing and presented testimony in behalf of their associations were very anxious to cooperate with me and requested information how our Association felt regarding objections to various paragraphs. There was a much better understanding among those representing other services. A better spirit of harmony prevailed, and it was gratifying to see the amount of recognition given A.P.C.O. by the Commission and these organizations.

The brief filed by me for A.P.C.O. was endorsed by Mr. Marion C. Shireman, Radio Supervisor, Los Angeles Police Department, who represented the Police Communication Officers in Southern California. A copy of the brief, filed by him as representative of the California Officers, follows:

My name is Marion C. Shireman.

I represent the Association of Police Communications Officers of Southern California, as well as the City of Los Angeles and the City of Glendale. I possess a radio telephone, first-class License No. P-11-1385.

We recommend that Rule 164.05 be stricken. And in its place be substituted:

(a) The licenses, except amateur may be renewed without examination provided under (a) the applicant has had three years satisfactory service in the aggregate during the term of the license, or, under (b) the applicant has had two years satisfactory service during the term of the license of which the last 90 days preceding the date of application have been continuous, or, under (c) the applicant has had one year's continuous satisfactory service during the last 13 months preceding the date of application.

We recommend that Rule 164.06 be stricken and in its place be substituted:

Renewal of operator license without required service is based solely upon the successful completion of an abridged renewal examination which examination will be given upon the filing of an application for renewal of license at any time during the last year of the license term. If renewal examination is not successfully completed before the date of expiration of the license sought to be renewed, the applicant must proceed as for an original license.

All other sections of the proposed regulations are satisfactory to our Association.

Gerald Morris, First Vice-President of A.P.C.O. and Superintendent of Telegraph New York Police Department, appeared before the Commission in behalf of his department and supported the A.P.C.O. brief, also stating the opposition of his department to the proposed changes.

Wm. E. Taylor, Sergeant-At-Arms of A.P.C.O. and Supervisor of Radio Baltimore Police Department, followed Mr. Morris, stating his opposition to the proposed changes and supporting the A.P.C.O. brief.

Maurice B. O'Neil
Maurice B. O'Neil,
President, A.P.C.O.