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Keeping Multi-Ops Legal — An FAQ

It's a lot of fun to host or participate with a multi-operator contest group. Along with the operating, the socializing, training, and learning are worth their weight in gold! While it's especially fun to invite visiting operators and train new recruits, it's important to remember that your station must comply with FCC Part 97 rules. (See https://www.arrl.org/part-97-amateur-radio for the complete FCC Part 97 rules.) This article will help you avoid any misconceptions about how the rules apply to guest operators, including remote operators.

Note that this article applies *only* to U.S. stations and FCC licensees. Rules in other countries may be considerably different. If you are invited to participate in a non-U.S. operation, be sure you are aware of that country's rules and are properly licensed. With the increasing number of "hybrid" multi-op efforts around the world, with in-person and remote operators located both in and out of the station's country, it is even more important to understand all the rules that apply.

Here in the U.S., for a competitive multioperator station, the safest and simplest course of action is for all operators, U.S. or foreign, to hold an FCC Extra-class license — a great reason for them to upgrade! If that is not possible, make sure control operators are available to ensure the station operates according to the rules.

License Requirements

Q: May I have non-licensed operators on my multi-op team?

A: Yes, but they will have to follow third-party rules (see the sidebar) under the supervision of a control operator.

Q: May a non-U.S. licensee with a CEPT-license or reciprocal permit operate?

A: Yes, and they must follow U.S. frequency allocations. For example, a visiting Canadian licensee may not operate a U.S. station on 20-meter phone below 14.150 MHz. See the ARRL's information on international operating at arrl.org/foreign-licenses-operating-in-u-s. Also see our *On All Bands* article, "Amateur Radio Guide to Following FCC and CEPT Rules" at onalbands.com/guide-to-following-cept-and-fcc-license-rules.

Q: May an operator participate via remote control?

A: Yes. An operator with a U.S. license may operate by remote control, no matter where they are located. A CEPT-licensed operator *physically located within FCC-regulated areas* may operate any station within FCC jurisdiction, including by remote. That operator has the same operating privileges as a U.S. ham when physically in the U.S.

Q: What if multiple operators will be using my call sign? What about using a club or a "borrowed" call sign? Who is responsible for proper operation?

A: The station licensee and the control operator(s) are equally responsible for all transmissions, according to Part 97.103(a) and (b). During a multi-op effort using your call sign, the team members may be designated as your control operators. If you use the call sign of another ham or club, the person allowing you to use their call sign, or the club trustee, is also responsible. It's a good idea to keep records of who is authorized to use a call sign.

Operating Privileges

I am the station licensee and hold an Extra-class license. I am planning to host multioperator contest operations at the station. Operators I invite will hold a variety of U.S. license classes.

Q: May a General-class licensee operate in the Extra-class sub-bands? May a Technician licensee operate on bands not available to Technician licensees?

A: For a Technician-class or General-class operator to work stations beyond the privileges of their license, they must operate under the supervision of a control operator whose privileges include those frequencies and modes.

Q: May a General-class operator at my station work DX stations operating split and transmitting outside the General-class sub-band or even outside U.S. allocations?

A: Yes, as long as that operator is transmitting in U.S. allocations, it doesn't matter on what frequency the DX station is transmitting.

Control Operator Responsibilities

Q: What are my responsibilities as the control operator?

A: You must ensure that the station is operated in compliance with the FCC rules. However you decide to accomplish that is up to you. The FCC has never made any hard and fast rules about how the control op must act. This is intentional — there are too many different methods of oversight and particular circumstances. The FCC is satisfied if the control operator can promptly stop improper operation — whether that is onsite or by remote control doesn't matter. The control operator will be responsible for responding to any questions about possible violations of the rules.

Q: What if the control operator must be temporarily away from the station and cannot monitor operation via remote control?

A: A temporary control operator must be designated during that period. Keep a record of who that is.

Q: At a multi-transmitter station, may there be more than one control operator at a time?

A: Yes. They must operate according to their license class.

Q: May the control operator be operating a different transmitter while supervising another operator?

A: Yes, as long as the control operator has sufficient awareness of station operation to ensure compliance with all FCC rules.

It's a good idea to keep a record of which operator was on the air at what times. This is usually done by the logging software, but everyone has to remember to "sign-in" when they begin operating.

Bottom Line

If a Technician or General-class licensee participates at a multi-op station with an Extraclass station licensee, be sure they understand they are operating under the supervision of the control operator. The same applies to all remote ops. More examples are provided on this ARRL web page: arrl.org/regulatory-faqs. While that web page is mostly focused on Field Day, the parallels with contest multi-op stations are clear. Contesting is a great way to welcome and train more operators. Be aware of the rules and plan accordingly!

(Editor's note: On March 12, 2025, the FCC issued Public Notice in which it sought public input on alleviating unnecessary regulatory burdens. The ARRL submitted input in several

areas (<u>https://www.fcc.gov/ecfs/document/104122962905678/1</u>), including third party rules. Be aware that the FCC is currently considering a wide range of regulatory changes that may affect the Amateur Service and the topics addressed in this article.)

Sidebar

Third-Party Rules

Who is a "third party?" The simple answer is any unlicensed person who wants to use amateur radio to exchange information. Third-party rules are set out in <u>Section 97.115 of the FCC rules</u>. Participating in station operation as a third party requires the presence of a licensed control operator permitted to operate on that band and mode.

Contacts for a third party are currently limited to stations in the U.S. and in those countries having a third-party agreement with the U.S. (<u>arrl.org/third-party-operating-agreements</u>) There is an FCC FAQ on third-party rules at <u>fcc.gov/wireless/bureau-divisions/mobility-division/amateur-radio-service/amateur-communications-operations</u>.