



NATIONAL HEADQUARTERS
CIVIL AIR PATROL
UNITED STATES AIR FORCE AUXILIARY
105 SOUTH HANSELL STREET
MAXWELL AIR FORCE BASE, ALABAMA 36112-6332

23 May 2012

MEMORANDUM FOR NHQ/EX
CAP-USAF/CC
CAP/CC
IN TURN

FROM: DO

SUBJECT: CAPR 100-1, *Communications*

1. The draft CAPR 100-1, *Communications*, was posted on the NHQ website for comments from 17 Feb – 18 Mar 12.
2. Comments received and incorporated in final draft (*changes are reflected in bold/italics*):

a. Paragraph 1-3a. (FROM NB MEMBER) Recommend revision of language from “event of floods, fire, tornado and other natural disasters” to “actual natural disasters, acts of terrorism, or other manmade disasters” to bring CAP language in alignment with FEMA National Response Framework scope.

RESPONSE: Changed to read:

Operational Missions. The Communications Program supports Homeland Security, search and rescue, emergency preparedness, disaster relief and other operational missions; augments existing communications services in the event of *actual natural disasters, acts of terrorism, or other manmade disasters*; and supports the U.S. Air Force.

b. Paragraph 1-4c. (FROM NB MEMBER) Inter-Operability: The word is usually spelled “interoperability”; see wording in 11-8.

RESPONSE: Changed to “*interoperability*” in this paragraph and globally throughout the document for consistency.

c. Paragraph 1-6 e(1). (FROM NB MEMBER) “IM Panels”. This is the first use of the abbreviation “IM”. I assume it means intermodulation?

RESPONSE: Changed to read:

Fixed repeaters and their associated components such as duplexers, *intermodulation (IM) panels*, cabinets and surge arrestors.

d. Paragraph 1-7j. (FROM NB MEMBER). Recommend adding “See section a. “Automatic Link Establishment”

RESPONSE: Changed to read:

HF/ALE. High Frequency Automatic Link Establishment. *See paragraph 1-7a.*

e. Paragraph 1-7k. Is “CAPNTC” a new abbreviation?

RESPONSE: An intended name change was scrapped. Abbreviation for the CAP National Technology Center changed back from CAPNTC in the original draft to the former “NTC” throughout the document. “CAP National Technology Center (*NTC*). A CAP facility that serves as the centralized communications maintenance depot and warehouse.”

f. Paragraph 1-7p. Recommend adding definition for NRCG.

RESPONSE: Definition added at first use in paragraph 1-7p: “RARS is the online database and system by which repeater authorizations are requested, approved by the *National Repeater Coordination Group (NRCG)*, and preserved for recordkeeping.” Definition also appears for clarity at paragraph 6-12b and 8-4b.

g. Paragraph 1-8. (FROM NB MEMBER) “NHQ/DOK”. This is the first use of the abbreviation “NHQ/DOK”. Recommend defining as Director of Communications (DOK).

RESPONSE: Changed to read:

Supplements/Operating Instructions/Waivers. Supplements, operating instructions or waivers will not be issued to this regulation without prior written approval of *CAP Chief of Communications, NHQ/DOK*.

h. Paragraph 1-9a. line 4; Says "of radios", I think it should say "or radio".

RESPONSE: Changed to read:

Release of Air Force Frequencies. Any CAP member who has completed OPSEC training, with a reasonable need to know, may be provided actual VHF-FM and HF operating frequencies; however, most CAP members may not need to know the actual frequencies. In most cases, frequency designators *or radio* channel numbers are sufficient and make the communications system more user friendly...

i. Paragraph 2-2. As worded, a wing/region would need to get approval in writing from NHQ/DOK to update their communications plan via a supplement (as suggested in paragraph 2-2) because supplements require prior coordination IAW paragraph 1-8. This would seem to excessive and cumbersome.

RESPONSE: Changed to read:

Communications Plan Requirements. Each CAP region and wing develops and publishes an annual communications plan, written in support of the next higher headquarters’ plan, and approved as policy by the respective commander. Such plans shall be reviewed annually and

kept current as conditions require; however, they need not be completely rewritten if conditions have not changed significantly from year to year. Previous requirements for separate Emergency Communications, Operations and Training, and Repeater plans are now consolidated into a single comprehensive plan.

j. Paragraph 2-2d. (FROM NB MEMBER) “Unit Plans are encouraged, but not required.” CI ALERT! Too vague and will cause findings.

RESPONSE: Changed to read: “Unit Plans are *not required but are optional*.”

k. Paragraph 2-3a. (FROM NB MEMBER) “Command and Control Communications” should be revised to “Command, Control, and Communications” and should read “C3” instead of “C³” (C cubed) in accordance and alignment with other DOD documentation. Also at paragraph 6-9c.

RESPONSE: Partially implemented. Our research shows that we were using the wrong word order. Therefore, throughout the regulation “Command and Control Communications” has been changed to “*Command, Control and Communications*” IAW JP 1-02, *Department of Defense Dictionary of Military and Associated Terms*. However the DOD abbreviation is “C³” (cubed) according to the same publication so this usage was retained.

l. Paragraph 2-5. (FROM NB MEMBER) Registering strong disagreement with the guidance: “Review of Plans. Communications managers at each level may approve or reject plans from subordinate units.” They can make recommendations, but the COMMANDER approves or disapproves.

RESPONSE: Changed to read: “Communications managers at each level may *make recommendations for revision of* plans from subordinate units.”

m. Paragraph 3-3a. (FROM NB MEMBER) “An after action report will be submitted to CAP-USAF LR/DO, NHQ/DOK and CAP-USAF/XO within 30 days after the exercise.” This is the first use of the abbreviations “LR/DO” and “XO”. Recommend defining terms.

RESPONSE: Reworded: “An after action report will be submitted to CAP-USAF *Liaison Region Director of Operations* (LR/DO), NHQ/DOK and the *CAP-USAF Director of Operations* (CAP-USAF/XO) within 30 days after the exercise.” Definition of DOK is handled at paragraph 1-8.

n. Paragraph 5-2. (FROM NB MEMBER) Last sentence seems to be contradicted by paragraph 6-3 as far as supervised or unsupervised operations. “When ICUT completion is listed on the member’s OPS QUALS record, the member is considered qualified for basic introductory-level operation of CAP radios in routine settings without further licensing approval.”

RESPONSE: Reworded and last sentence removed. Paragraph now reads: “The initial training for all CAP personnel using CAP radios is the Introductory Communications User’s Training (ICUT). This course replaces both the Basic Communications User training (BCUT) and the Advanced Communication Users training (ACUT). ICUT is offered online *and includes* several segments of produced video instruction. Subsequent *skills evaluation* by a mentor/evaluator is

also required. The only prerequisites for ICUT are being an active CAP cadet or senior member, as defined by CAPR 39-2, *Civil Air Patrol Membership*, and completion of OPSEC training.”

o. Paragraph 5-2c. (FROM NB MEMBER) Incorrect reference. This paragraph states "All mentors/evaluators must have completed ICUT before they may supervise performance of skills and procedures of ICUT students, except as provided in paragraph d, below." Should this be paragraph e?

RESPONSE: Reference corrected.

p. Paragraph 5-2c. “Communications staff member recorded in eServices at any level may serve as mentors/evaluators. All mentors/evaluators must have completed ICUT before they may supervise performance of skills and procedures of ICUT students”. They should also have a mentor complete SET. This would be compatible with the rest of the ES modules.

RESPONSE: Reworded: “All mentors/evaluators must have completed ICUT *and Skills Evaluator Training (SET)* before they may supervise performance of skills and procedures of ICUT students.”

q. Paragraph 5-2d. (FROM NB MEMBER) “Students completing online ICUT instruction or classroom instruction have 45 days to demonstrate required skills to a qualified evaluator”. Because the ICUT curriculum has yet to be released for review, is 45 days adequate for a candidate to adequately identify a qualified instructor, arrange a meeting in person, and demonstrate required skills? No other SQTR places such a tight timeline to meet a requirement.

RESPONSE: Timeline extended to 180 days: “Students completing online ICUT instruction or classroom instruction have *180 days* to demonstrate required skills to a qualified evaluator”

r. Paragraph 5-3. (FROM NB MEMBER) “The master record of assigned call signs is the national eServices system.” Does this mean that eServices will not be storing member-issued tactical call signs? If so, will these appear on the 101 card?

RESPONSE: It is the intent that the master record will reside in eServices in the future, however IT is not yet ready to implement. The paragraph has been edited to remove the reference to eServices at this time. It will be added again later when the system is ready.

s. Paragraph 6-9c. (FROM NB MEMBER) “Ground Team leader” should have “Leader” capitalized as a formal position.

RESPONSE: Capitalized. Now reads, “Holders of region or National staff positions who are fulfilling active operational roles for wings, such as Incident Commander, Ground Team *Leader*, etc., may and should be issued radio equipment for those operational positions by the wing they are supporting in those positions, IAW the TA.”

t. Paragraph 6-12a(1). (FROM NB MEMBER) “commpermissions@capnhq.gov” is an actual mailto: hyperlink. This is a change from earlier in the document (reference Page 9, 1-9, a.) which has it only as text. Recommend constant delivery of email addresses in document for

formatting. This occurs several times throughout the document but will only be addressed in this one comment.

RESPONSE: Changed for consistency. All references in the document are now hyperlinks.

u. Paragraph 6-12f. (FROM NB MEMBER) The office symbol “DOK” is used alone. Should be revised to be “NHQ/DOK” to avoid confusion and remain consistent with other references in the regulation.

RESPONSE: Changed for consistency. All references in the document are now *NHQ/DOK*.

v. Paragraph 6-13a(2). (FROM NB MEMBER) “with the proviso” should read “with the provision”.

RESPONSE: Reworded. “Digital ID may be programmed, with the *provision* that this may need to be reprogrammed at a later time due to encryption/OTAR requirements.”

w. Paragraph 6-13b. (FROM NB MEMBER) Recommend revision and standardization of names to “Micom-3”, “Micom-2E”, and “Micom-2B” in alignment with Elbit / Mobat / Motorola documentation.

RESPONSE: Reworded here and globally throughout the regulation. “CAP *Micom-3* and *Micom-2E* HF/ALE radios shall be programmed with standard channel loads, found on the communications website. Programming of *Micom-2B* radios owned by CAP may be determined by each region; however, NHQ may provide a channel load on the communications website.”

x. Paragraph 7-1. (FROM NB MEMBERS) “Members are authorized to operate CAP radio stations upon completion of the ICUT class, whether completed online or in person.” This duplicates or at least overlaps guidance in paragraphs 5-2 and 6-3. Guidance should also clarify “unsupervised” operations.

RESPONSE: Agree. Previous edits above clarified the relationship between paragraphs 5-2 and 6-3. To clarify the relationship of paragraph 7-1, the second sentence was modified to simply refer to the guidance presented in paragraph 6-3. It now reads: “Members are authorized for *unsupervised* operation of CAP radio stations *IAW paragraph 6-3.*”

y. Paragraph 7-4. Fourth sentence says wing and group tiers MAY use HF/ALE and/or VHF/FM. “Wing and group tiers may use HF/ALE and/or VHF-FM.” That can be interpreted to mean HF is not a requirement at wing level. This seems odd, especially when contrasted with later sections.

RESPONSE: Reworded. “Wing and group tiers use HF/ALE and/or VHF-FM, *as needed.*”

z. Paragraph 7-4a. (FROM NB MEMBER) “CAP VHF-FM is a nationally-standardized system using fixed land repeaters, temporary land and airmobile repeaters, and Mission Critical and Mission Essential radios that have standardized programming and channelization and comply fully with NTIA standards”. This sentence is lengthy, difficult to read, and uses “and” five times.

RESPONSE: Reworded. “CAP VHF-FM is a nationally-standardized system using fixed land repeaters, temporary land and airmobile repeaters, base stations, air and land mobiles and *portables*. *All radios adhere to a nationally* standardized programming and channelization plan and comply fully with NTIA standards.”

aa. Paragraph 7-4b(2). (FROM NB MEMBER) “Each wing shall have at least one HF/ALE station in continuous service on the region net NLT 30 June 2012.” Clarify the statement that each wing shall have at least one HF/ALE station in continuous service NTL 30 June 2012. What does continuous service mean? Somebody at this station 24/7/365?

RESPONSE: Reworded. “Each wing shall have at least one HF/ALE station in continuous service on the region *ALE* net NLT 30 June 2012. *These stations will be attended as the mission requires.*”

ab. Paragraph 7-4d. (FROM NB MEMBER) “No other VHF-AM frequency is authorized for CAP ground station use.” What about by letter of agreement with an FBO or other authorized user ie. ARINC? This would seem to preclude the other agreements.

RESPONSE: Reworded. “No other VHF-AM frequency is authorized for CAP ground station use *unless requested and authorized by an FCC licensee.*”

ac. Paragraph 7-6c. “Written logs shall be maintained in ink. No hand-written log, or portion thereof, shall be erased, obliterated or willfully destroyed within the required retention period, except as required to improve accuracy. If kept on computer, logs may be edited for accuracy. Any necessary correction must be made or authorized only by the person originating the entry.” This paragraph is contradictory between the main paragraph and sub-paragraph c . Either the records may be corrected or not. Legal tracability indicates that computer records must not be corrected other than by an additional record, not by obliteration of the original record.

RESPONSE: Reworded. Removed the last phrase of the second sentence and all of the third sentence. Now reads: “Written logs shall be maintained in ink. No hand-written log, or portion thereof, shall be erased, obliterated or willfully destroyed within the required retention period. Any necessary correction must be made or authorized only by the person originating the entry.”

ad. Paragraph 7-7. (FROM NB MEMBER) “P-25 Digital Operation. See paragraphs 6-13, 8-5 and 8-6 for guidance related to P-25 operation.” Citation is incorrect. Paragraph 8-5 does not contain any information about P-25.

RESPONSE: Citation Corrected. “P-25 Digital Operation. See paragraphs 6-13, **8-4** and 8-6 for guidance related to P-25 operation.”

ae. Paragraph 7-7. “Every CAP repeater, whether fixed or tactical, must be accessible with both a Primary Discrete Continuous Tone-Coded Subaudible Squelch (CTCSS) tone AND a Primary Discrete P-25 Network Access Code (NAC) as approved by the National Repeater Coordination Group (NRCG). These two Primary Discrete codes must correspond based on Table 8-1. The Common Access Tone (CAT) formerly required on CAP repeaters is no longer

mandatory. Additional codes may be installed if approved in writing by the NHQ/DOK. Additional installed codes, however, are inadvisable as they may result in significant repeater activation delays. Repeaters shall NOT be programmed to respond to carrier-only signals. All repeaters must encode their Primary discrete CTCSS tone or NAC, dependent on mode.” There is no longer any reason to mention CAT.

RESPONSE: CAT sentence deleted. “Every CAP repeater, whether fixed or tactical, must be accessible with both a Primary Discrete Continuous Tone-Coded Subaudible Squelch (CTCSS) tone AND a Primary Discrete P-25 Network Access Code (NAC) as approved by the National Repeater Coordination Group (NRCG). These two Primary Discrete codes must correspond based on Table 8-1. Additional codes may be installed if approved in writing by the NHQ/DOK. Additional installed codes, however, are inadvisable as they may result in significant repeater activation delays. Repeaters shall NOT be programmed to respond to carrier-only signals. All repeaters must encode their Primary discrete CTCSS tone or NAC, dependent on mode.”

af. Paragraph 8-5a(7). Add requirement for maintenance of the online repeater directory. With no requirement for anyone to keep it current it will quickly become worthless and out of date.

RESPONSE: Task added under wing responsibilities for repeater management, paragraph 8-5c(1): “*Updating the on-line repeater directory to identify any repeater off the air for longer than 24 hours.*”

ag. Paragraph 8-5c(1). Recommend adding definition for POM.

RESPONSE: Definition added at first use in paragraph 8-5c(1): “Initial funding and procurement of repeater hardware via the DoD *Program Objective Memorandum (POM)* process, as authorized in the TA.”

ah. Paragraph 8-6a. (FROM NB MEMBER) “Mission Communications nets and activities should operate in P-25 digital mode as a first preference. Designated portions of these missions may be operated using analog mode; however, the goal should be 100% P-25 operation.” Remove completely! There is no mission requirement for P-25 digital. To require compliance with the section will eliminate all member owned radios from participating in a mission that is P-25.

RESPONSE: Partially implemented. The paragraph was reworded to remove the P25 requirement while still encouraging its consideration. “Mission communications nets and activities should *consider operating* in P-25 digital mode. *This mode provides benefits which may be advantageous for mission accomplishment.*”

ai. Paragraph 9-8a. “HF voice net schedules for operation on region CAP channels are coordinated and established at region level. Schedules for national voice nets on national frequencies are coordinated and established by NHQ/DOK.” It says HF voice net schedules are coordinated and established at region level. Perhaps that is just the schedule, and wings still run their own HF net? Can it be blended with the region net?

RESPONSE: Reworded. “*Wing and region HF voice nets using the region HF suite are coordinated at the region level.* Schedules for national voice nets on national frequencies are coordinated by NHQ/DOK.”

aj. Paragraph 9-12. (FROM NB MEMBER) “GMRS is a separate FCC service which may operate on some of the same frequencies as FRS, but at higher power. Unlike FRS, GMRS is a licensed service. A license for a specific geographical area is required and fees are charged by the FCC for this service. Use of GMRS radios by CAP is specifically prohibited by the Air Force.” Is the use of FRS only channels in FRS/GMRS capable radio prohibited? The last sentence as worded prohibits use of any radio which is “GMRS capable” even if a user is in compliance with FCC Part 95 for use on 0.5 watt FRS channels.

RESPONSE: Reworded. “GMRS is a separate FCC service which may operate on some of the same frequencies as FRS, but at higher power. Unlike FRS, GMRS is a licensed service. A license for a specific geographical area is required and fees are charged by the FCC for this service. Use of GMRS *frequencies* by CAP is specifically prohibited by the Air Force.”

ak. Paragraph 9-13b. “COMSEC. CAP’s communications on these radios may be monitored, either by federal agencies or by the general public. It is important that CAP radio operators using these common resources conduct themselves professionally and preserve operational and communications security.” COMSEC needs to be reworded. It does not sound correct the way it is written unless you refer to “the radios mentioned above” or radios mentioned in 9-10 through 9-13” Do not rule on only 9-13 FRS/ISR.

RESPONSE: Reworded. “*Security Consideration.* CAP’s communications on *ISR or FRS* radios may be monitored, either by federal agencies or by the general public. It is important that CAP radio operators using these common resources conduct themselves professionally and preserve operational and communications security.”

al. Paragraph 9-14. (FROM NB MEMBER) “Operation on amateur radio frequencies requires an FCC-issued amateur radio license.” Last sentence should read “unsupervised operation on amateur radio frequencies requires an FCC issued amateur radio station license.

RESPONSE: Reworded. “Operation on amateur radio frequencies requires an FCC-issued amateur radio license, *or supervision by an FCC licensed operator.*”

am. Paragraph 10-1b. (FROM NB MEMBER) No emission designator is listed for HF/ALE.

RESPONSE: Sub-paragraph (2) added: “*3K00H2B ALE signaling*”

an. Paragraph 10-1b. The emissions designator for P25 is incorrect. “8K00F1D, P-25 Digital voice modulation.” My research shows it should be 8K10F1D, P-25 Digital voice modulation. (..10.. not ...00..)

RESPONSE: Partially implemented. A cross check of our frequency assignments shows 8K10F1E. For consistency with the frequency assignments, listing was changed to: “*8K10F1E*, P-25 Digital voice modulation.”

ao. Paragraph 11-1. The interoperability guidance is confusing. Compare paragraph 11-1 with 11-5 and 11-8. What is the process for liaison frequency authorization? This needs to be clearly stated. Can we use local law enforcement frequencies? In one place it seems to encourage it but in another it says we can't. What can CAP legally do on other people's frequencies, if anything? Can we let partner agencies come to our frequencies? Please clarify this chapter.

RESPONSE: Guidance has not changed but paragraphs 11-1, 11-5 and 11-6 reworded for clarity and agreement. "11-1. General. Many federal and local agencies have installed radio systems to meet their day-to-day or emergency needs. *The key to interoperability with partner agencies is advance planning. Communications managers must strive to anticipate potential interoperability requirements and plan accordingly. However, we must also remember that interoperability (liaison communications) is limited to coordination between cooperating agencies. No agency shall use the frequencies of another agency for their own internal communications. With proper coordination CAP partner agencies can come to our frequencies for coordination but they cannot use CAP frequencies for their internal communications. Similarly, CAP can make advance arrangements to access other agencies frequencies to coordinate operations but we may not use their frequencies for our internal communications. See 11-5 and 11-6 below for further guidance.*"

ap. Paragraph 11-5. Same input as above.

RESPONSE: Guidance has not changed but paragraphs 11-1, 11-5 and 11-6 reworded for clarity and agreement. "11-5. CAP Participation in Government Agency Communications Programs. CAP stations operating on *frequencies assigned or licensed to another agency* must have written authorization from *that* agency *and* a copy of the *applicable* FCC license or federal frequency *assignment*. *This documentation must be coordinated with* NHQ/DOK for approval. CAP use of *other* agencies' frequencies is *strictly* limited to liaison communications for coordination between the two organizations. *Such frequencies* will not be used to satisfy internal CAP-to-CAP communications requirements."

aq. Paragraph 11-5. Same input as above.

RESPONSE: Guidance has not changed but paragraphs 11-1, 11-5 and 11-6 reworded for clarity and agreement. "11-6. Liaison Radios are legal to be used in other radio services outside of CAP and are maintained in inventory for that purpose. A small number of these radios, as determined by operational requirements, may be used for communication with other departments and agencies. Such operations shall be used only on authorized frequencies to conduct official CAP business during joint operations, in accordance with *approved planning per paragraph 11-5.*" Remainder of the paragraph deleted: "in accordance with *a CAP and CAP-USAF approved Memorandum of Understanding. IAW paragraph 5-6b, agencies licensed by the Federal Communications Commission may not use frequencies assigned to CAP for their own internal communications without extensive advance coordination with both the NTIA and the FCC. CAP does not, itself, have the authority to authorize such operation. Interagency operation on CAP frequencies, based only on CAP's authorization, may only be done where CAP is an active participant in the communications.*"

ar. Paragraph 11-8. (FROM NB MEMBER) Several all caps words including “ONLY” and “NOT”. Recommend using lower case. Emphasis is clearly understood from language used.

RESPONSE: All upper case words edited to lower case.

as. Paragraph 11-8d. (FROM NB MEMBER) “CAP units are encouraged to determine appropriate local interoperability channels well in advance of any actual emergency and establish formal, mutually-signed MOUs, operations plans (OPLANS) or similar arrangements with the appropriate agencies.” This is too restrictive. NTIA allows programming, operation is at the invitation of the licensee. "similar arrangements" is too loose and may not necessarily be interpreted as a Tactical Interoperable Communications Plan (TICP). Insert after MOUs " Tactical Interoperable Communications Plan (TICP)”.

RESPONSE: Language added. “CAP units are encouraged to determine appropriate local interoperability channels well in advance of any actual emergency and establish formal, mutually-signed MOUs, operations plans (OPLANS), *Tactical Interoperable Communications Plans (TICP)* or similar arrangements with the appropriate agencies.”

3. Comments received and *not* incorporated in final draft:

a. Paragraph 2-2c. (FROM NB MEMBER) “Wing Plans support the annual Region Plan and shall be submitted to NHQ via the communications website, with a copy sent to the Region DCS-Communications, not later than 10 April of each year, beginning in 2013.” Suggest rewrite to say, “Wing Plans support the annual Region Plan and shall be submitted to NHQ via the *Region*, not later than 10 April of each year, beginning in 2013”

RESPONSE: Direct submittal of plans to region and NHQ for simultaneous review has been in place for many years. This process expedites review for the benefit of all parties. Sending them serially via the region would only serve to slow down the process and could lead to wings receiving findings during inspections if plans are lost and never reach NHQ.

b. Paragraph 2-2e. (FROM NB MEMBER) “Regardless of the level of the organization, plans must comply with all applicable directives, to include communications plans of all higher headquarters.” Unnecessary. Basic premise of regulations.

RESPONSE: Unfortunately, our annual review of plans shows that higher directives are violated from time to time. This paragraph is required to reinforce this requirement to the comm managers.

c. Paragraph 2-4. (FROM NB MEMBER) “Communications plans are policy-level documents, approved by the respective Commander, with input from the respective Operations staff.” Reword to drop the requirement for coordination with Operations. Coordination within the wing staff is assumed.

RESPONSE: Unfortunately such coordination is not something we can assume. Our annual review of plans shows an all-too-common tendency for communications managers to fail to

coordinate with their primary customers. This seemingly unnecessary statement is intended to remind communications managers of what should be obvious.

d. Paragraph 2-6. (FROM NB MEMBER) “The CAP National Staff and/or CAP National Headquarters staff may task wings and/or regions to submit special plans for special programs or activities, such as the 2008-2009 Narrowband Transition Plan. In such cases, formats or other guidance will be delivered to Directors of Communication by posting on the communications website and/or delivery via the CAP-DC listserv.” Hocus pocus. Email the thing.

RESPONSE: The CAP-DC listserv is an e-mail delivery system.

e. Paragraph 3-2. (FROM NB MEMBER) “The H-1 report is no longer required.” Then neither is this paragraph.

RESPONSE: Because of the long-standing requirement for the H-1 report, it is appropriate to include this notice of discontinuance in this version of the regulation. It will be eliminated in the next revision.

f. Paragraph 3-3. (FROM NB MEMBER) Delete the entire section on Annual Radio Communications Effectiveness Evaluations and replace with: “National Headquarters will conduct two Communications Effectiveness evaluations per year. Wings and Regions must participate in at least one. Reporting will be through the respective region.”

RESPONSE: Mission effectiveness is only ensured by regular testing and such testing must be done at the region and wing levels in order to address variations in the program requirements across the country.

g. Chapter 4. (FROM NB MEMBER) Should not even be in this Regulation. The CAP has a whole regulation dedicated to awards, move this to that location and get it out of the communications regulation.

RESPONSE: CAPR 35-6 regularly refers back to base program regulations, so CAPR 100-1 must still address the specifics of the Communications Awards.

h. Paragraph 5-2. (FROM NB MEMBER) “The initial training for all CAP personnel using CAP radios is the Introductory Communications User’s Training (ICUT). This course replaced both the Basic Communications User training (BCUT) and the Advanced Communication Users training (ACUT). ICUT is offered online, including several segments of produced video instruction, with subsequent observation and approval of certain skills and procedures by a mentor/evaluator.” Replace with: “When ICUT completion is listed on the member’s OPS QUALS record, the member is considered qualified for basic introductory-level operation of CAP radios in routine settings without further licensing approval.”

RESPONSE: Because ICUT is new, this version of the regulation needs to clearly explain how the new training relates to BCUT and ACUT. This explanation may be removed in the next version.

i. Paragraph 5-2. (FROM NB MEMBER) “The initial training for all CAP personnel using CAP radios is the Introductory Communications User’s Training (ICUT). This course replaced both the Basic Communications User training (BCUT) and the Advanced Communication Users training (ACUT). ICUT is offered online, including several segments of produced video instruction, with subsequent observation and approval of certain skills and procedures by a mentor/evaluator.” GES should be a pre-requisite.

RESPONSE: GES is not a prerequisite for ICUT because ICUT will be taken by people who will not be involved in the Emergency Services program.

j. Paragraph 5-2. (FROM NB MEMBER) I also am against the Wing DC not being allowed to designate who the mentors/evaluators are. In the current program, the DC authorizes ACUT instructors. This allows the DC to control the quality of the course and the material presented. While the course and material is becoming standardized via online training, the evaluation is still open to any member that has previously completed the training and serves in a Communications Duty Position. I feel that this may diminish the quality of the evaluations.

RESPONSE: We are also sensitive to this potential. However, the most common member complaint in regards to communications user training is that they can't get signed off on tasks because of a lack of certified evaluators. ICUT is the beginning of a new direction in which we hope to remedy this major issue. Previously the quality of the instructor was key because training was not standardized. With ICUT the curriculum is not only standardized but self-paced and online. This opens up the training and makes it available to all. We have endeavored to provide the evaluators with strict, standardized guidelines to keep the evaluations fair but valid.

k. Paragraph 5-4. (FROM NB MEMBER) “The CAPF 76, *Radio Station Authorization*, is not required for CAP members to operate CAP radio stations, as long as the ICUT training has been completed and documented in OPS QUALS. The card may be issued by communications managers, as needed, such as if local law enforcement requires proof of authorization. Only the current version may be used. In most cases, a separate CAPF 76 is not needed because the record of Communications qualification is found on the CAPF 101, *Civil Air Patrol Specialty Qualification Card*, found in Ops Quals.” The 76 is no longer needed because it’s on the 101 card. It should no longer even exist. Outside law enforcement cannot demand proof of a CAP members qualification to operate CAP equipment. In addition, just simply tie this in with SET and you can get rid of half or more of this paragraph set.

RESPONSE: There are still state and local law enforcement in at least one state that have targeted CAP members with radio equipment. Since our system is not licensed by the FCC our members do not have the kind of license expected. This could leave our members without an explanation that will suffice. In the near future the Radio Operator card will move to eServices as an optional printout for those members that need it. At that time the Form 76 will go away.

l. Paragraph 5-5b. (FROM NB MEMBER) Communications Meetings/Conferences. Regular interaction of communicators and communications managers from regions, wings and subordinate units is essential to maintaining an effective communications program. This facilitates discussion of communications problems, new proposals, an exchange of ideas, development of mutual understanding, an opportunity for individual and unit recognition, discussion of program changes and a renewal of interest by the members. This “cross-pollenization” of ideas helps build team spirit which is crucial to the Communications Program. Each region and wing should engage in one or more of the following activities for communications managers and others interested in the communications program:”

PLEASE get rid of this. This is what Wing Staffs do, and telling us to do it in a regulation is simply another set of check boxes on a CI. It’s not necessary.

RESPONSE: Even with a long-standing requirement, there are still frequent write-ups indicating that many wing DCs do not communicate effectively with members of subordinate units. Unfortunately the comm program doesn’t always do a good job of communicating. This paragraph is needed to ensure such meetings are made available to members at unit level.

m. Paragraph 6-12d(2)(b)2. (FROM NB MEMBER) “Provide make, model and serial number of all test equipment used to retune/realign the repeater, and the owner of the test equipment (company information if from a commercial provider). This is not required if contracting with a commercial radio shop. The serial number is not required if renting certified equipment.” The Wing should be responsible to see that its equipment is properly calibrated. There is no need for National to do a separate approval.

RESPONSE: There is confusion in the field stemming from a misunderstanding of the testing standards imposed by the NTIA. Some member technicians still do not realize that test equipment must be calibrated to this level. For this reason there have been problems in the past with wings not requiring calibrated equipment. Therefore, this section is important to inform the field and ensure CAP compliance with NTIA standards for test equipment.

n. Paragraph 6-12d(2)(b)3. (FROM NB MEMBER) “Provide documentation of the most recent calibration of the test equipment to an NIST Traceable Standard.” This should be revised to “equipment to a NIST”.

RESPONSE: Standard grammar rules put the word “an” before an “N” consonant sound.

o. Paragraph 6-13a(3). (FROM NB MEMBER) “Transmitter time out, scan lists and alias lists may be programmed as desired.” Recommend this sentence be revised to recommend national scan lists and monitoring of CAPGUARD. See 8-3a.

RESPONSE: The Comm Team feels that a national scan list is inappropriate because of varying mission requirements. Monitoring of CAPGuard is adequately addressed in paragraph 8-3a.

p. Paragraph 7-2. (FROM NB MEMBER) “Safety” Requirements seem out of date since we no longer have high voltage circuits in our radios.

RESPONSE: 120 volts AC is considered high voltage. Also, Inverter circuits generate voltages as high as 400 volts DC, which can deliver a severe shock.

q. Paragraph 7-13. (FROM NB MEMBER) “Voice Call Signs” It might be nice to expand the first five defined callsigns to include LG (6), DO (7), DOS (8).

RESPONSE: This request creates new policy that would require board approval. Adding it at this point would not allow feedback from other National Board members. Discussion of this subject in the past has consistently revealed that it is a contentious area upon which wings do not agree.

r. Paragraph 7-13. (FROM NB MEMBER) “Voice Call Signs” Please add Director of Operations (DO) as callsign number 6.

RESPONSE: This request creates new policy that would require board approval. Adding it at this point would not allow feedback from other National Board members. Discussion of this subject in the past has consistently revealed that it is a contentious area upon which wings do not agree.

s. Paragraph 7-13c. (FROM NB MEMBER) “Aircraft Call Signs” May I suggest mandating that aircraft use the wing numerical designator as the first two digits and the last two of the tail number as the last two digits. Any duplicates drop the last number and move back one. I.e. N12345 in Maryland would be CAP1845. N75945 would be CAP1894.

RESPONSE: This request creates new policy that would require board approval. Adding it at this point in the review process would not allow feedback from other National Board members. This proposal will be filed for the next rewrite of CAPR 100-1.

t. Paragraph 7-13d(1). (FROM NB MEMBER) “ALE Identifiers. Civil Air Patrol uses unique identifiers, coordinated with the Air Force, for identification during ALE operation. No deviations are permitted.”

ALE standard addressing needs to be discussed. If “No deviations are permitted” identification of a station by the voice call will create problems. For example, wings were provided Rapid Deployable Packages (RDPs) and Mobile HF Micom-3T radios which could have different users with different CAP tactical call signs. NHQ sent a document at the start of the narrowband transition process advising that tactical call signs not be used for the digital ID as the user at the radio could also change. Recommend that paragraph (1) be revised to include tactical (0004PACAP for PennCAP 4) or radio serial number (1234PACAP). Serial numbers of radios will not change, and assigned information can be found in ORMS to identify permanent stations nationwide. This would permit calling of specific stations based on serial number ALE Callsigns, and avoid duplication state to state.

RESPONSE: Unlike the VHF equipment, the Micom self address can be easily changed by the operator from the front panel. In order to avoid confusion the ALE self address should normally reflect the callsign in use at the station.

u. Paragraph 8-3. (FROM NB MEMBER) “Simplex operations are those that are conducted on a single frequency. Within CAP, these frequencies must be used solely for communications between active CAP stations and must not be used to meet infrastructure requirements such as repeater inputs and similar applications. Any exceptions to this must be approved in writing by the NHQ/DOK.” Currently Border Zone Repeater inputs utilize CAP Simplex channels. A blanket authorization is needed.

RESPONSE: The requested authorization has been provided in writing. The current border situation is regarded as temporary. Our frequency manager is working to resolve the Canadian frequency problem which is causing the non-standard usage in NER.

v. Paragraph 8-5d. (FROM NB MEMBER) National Repeater Coordination Group. Should add at the end “All actions taken by the NRCG will be published on the CAPNTC secure website within 24 hours of the NRCG vote and shall include the names and vote (Approve/Disapprove / Abstain / Absent) status of all NRCG members.” This addition is required for transparency.

RESPONSE: This request creates new policy that would require board approval. Adding it at this point would inappropriately create policy and would deny other National Board members the opportunity for comment. Specifically, this suggestion requires a change to the charter of the NRCG which would require a policy level decision outside the current process. Therefore, this suggestion will be forwarded to command for consideration.

w. Paragraph 9-3. (FROM NB MEMBER) “CAP’s VHF-FM frequency assignments are on a nationwide (United States & possessions) basis, with some exceptions in border zones.” Should be revised to read “(United States and Territories)” to be in alignment with the Code of Federal Regulations.

RESPONSE: “United States and Possessions” (USP) is a standard spectrum management term. See NTIA Manual, ANNEX G, Abbreviations.

x. Chapter 10. (FROM NB MEMBER) Suggestion to delete chapter. Isn’t this all repeated information from elsewhere?

RESPONSE: A review of the draft confirms that it is not. This chapter is where the frequency management aspect of the communications program is covered. There are some other references in other parts of the regulation which refer to this chapter but Chapter 10 is central.

y. Paragraph 10-4a. (FROM NB MEMBER) “VHF base, mobile or portable ground stations: 50 Watts” The 50 watt limit should be increased to 100 watts – at least for the West Coast.

RESPONSE: The authorized power output is limited by our frequency authorizations.

z. Paragraph 11-2c. (FROM NB MEMBER) “Where amateur radio “third party” traffic is needed to support a CAP mission, CAP communication managers may seek the support of local amateur radio clubs and organizations. CAP members who are licensed amateur radio operators and who are not acting in any CAP capacity (e.g. not signed into a mission) are not prohibited

from exercising their amateur privileges and supporting affiliated amateur organizations using privately owned amateur equipment.” This, as written, is inconsistent with para 11.2. If CAP is supporting, say the Red Cross, by providing personnel, the CAP personnel, signed into that mission, should be able to operate an amateur radio station on behalf of the Red Cross. This is different than on behalf of CAP.

Add "Operation of an amateur radio station by a duly licensed CAP member during a CAP mission for the purpose of handling radio traffic not on behalf of CAP, is authorized." Add "Operation of an amateur radio station by a duly licensed CAP member during a CAP mission for the purpose of handling radio traffic not on behalf of CAP, is authorized."

RESPONSE: When signed in to a mission, members are CAP and acting as representatives of the federal government, regardless of the nature of the traffic being sent. This prevents them from utilizing amateur spectrum in support of the mission. This role is properly fulfilled by amateurs who are not operating under federal status.

aa. Paragraph 11-3d. (FROM NB MEMBER) “The federal frequencies used to support SHARES are also used daily by federal agencies to support essential government operations. CAP stations are not authorized on these frequencies to conduct radio checks. All CAP participation in SHARES tests and exercises will be coordinated, in advance, by NHQ/DOK.” What if the CAP station is also a registered SHARE S station?

RESPONSE: SHARES stations must be "activated" in order to use SHARES frequencies, thus eliminating the possibility of testing at other times.

//Signed//
JOHNNY DEAN
Director, Operations