

Greetings, FCC Commissioners,
re. Technician privilege enhancement, PRM RM-11828

Technicians have voice privileges in the 10 meter band which is currently only good for local communications (with a few exceptions). Here, the technicians can develop their abilities with HF voice communication and yearn to achieve a General license which will let them use these abilities and talk to the world. Granting HF privileges on more HF bands as proposed would remove much of the incentive for the Technicians to upgrade to General (see below for a version of this that I would support). Thus, implementing this proposal would reduce the number of Technicians upgrading to General. That's bad for the amateur radio service.

It is important to me that more Technicians upgrade to General class because it raises the overall knowledge level of participants in the amateur radio service. Conversations are more fun and the likelihood that any ham can configure emergency communications with no advance notice rises.

Technicians already have privileges to participate in amateur radio worldwide communication by using the Technician CW sub-bands. Those who find this attractive are learning Morse code while they also develop the knowledge to pass their General exam. The CW sub-bands provide a way for Technicians to learn about many aspects of HF communication in a fun, learn-by-doing context. This system also helps mitigate the loss of Morse code knowledge that began when the Morse code requirement was eliminated. Morse code is valuable beyond nostalgia. When most other modes don't get through, Morse code does. The amateur radio service needs to sustain the presence of participants who know Morse code.

As a compromise, I would support providing Technicians access to a very small Phone sub-band (25 kHz wide) on 40 meters. This will give them a taste for HF phone operation alongside the spectrally-adjacent incentive to upgrade to General so that they can enjoy the ability to use more of the band and other bands. I propose 40 meters because it works well in the evenings when people with day jobs are likely to have free time, and antennas are shorter than for 80 meters and thus easier to build and install. Absent the need for compromise, I do not support 40m access for Technicians.

I disagree with some of ARRL's claims in the proposal. I don't think it will attract more people to amateur radio because gaining a Technician license already opens a huge range of exciting activities to the new licensee and isn't very difficult. It will definitely **not** encourage further self-training because it will remove much of the incentive for that training!

The overall number of amateur radio operators does not need to grow in order to sustain the amateur radio service. However, a substantial influx of new licensees **is** necessary, and the Technician license entry point serves that purpose. Other factors that limit that influx, mainly increased attraction of technically-adept potential newcomers to other venues for expression and development of their interest, are not going to be remedied by the proposed adjustment of Technician privileges, nor do they need to be. What's important for these people is that there **is** a venue for them to grow and learn. ARRL helps sustain the influx by ensuring that participants in a wide variety of technical activities are aware of the opportunities (in personal development, fun, and community service) that amateur radio offers them. This proposal is an unnecessary and ineffective distraction from that more-effective approach. Please do not implement it.

Thank you for your consideration.

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ARRL Member