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February 10, 1993

The Secretary
Federal Communications Commission
Washington, D. C. 20000

In the matter of a proposal to)
expand the operating privileges)
of Novice Class license holders)
in the in the Amateur Radio Service)

NPRM 92-289

The undersigned has been licensed in the Amateur Radio Service since 1977 and is the holder of an Extra Class license, callsign AA9AW.

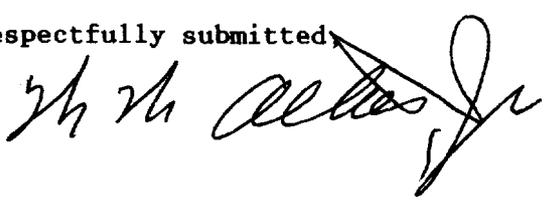
The undersigned is in PARTIAL support of the proposals set out in the above referred NPRM, but in FIRM OPOSITION to the others.

The proposals submitted by the American Radio Relay League are sound, supported by logic and should be incorporated into the Commission's rules, specifically seting aside the frequencies between 222.00 MHz and 222.150 MHz for other than repeater station operation and expanding the privileges of Novice Class license holders to include the entire 222.000 MHz to 225.000 MHz.

The proposals to permit Novice Class license holders to be the licensees and owners or operators of stations in repeater service is not adequately supported, nor is the granting of such permit shown to be needed. To compare the licensee of a station in repeater service in the Amateur Radio Service to such licensee in the General Land Mobile or Private Land Mobile services is to not understand the differences between those services. The operation and maintenance of such station in the Amateur service requires an operator who is technically skilled. There is no similar requirement in the other service. Additionally, the Commission's operating rules for the Amateur service differ markedly from those of the other services.

The requirements for obtaining a Novice Class license in the Amateur service do not demonstrate that the holder of such license has either the skill or knowlege of rules to qualify the holder to be the licensee of a repeater in the Amateur service. The Commission is urged to refrain from making that change to its rules.

Respectfully submitted



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