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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of

Amendment of the Amateur Service	)	**PR Docket 92-289**
Rules Concerning the 222-225 MHz	)	**RM-7868, RM-7869**
and 1240-1300 MHz Frequency Bands	)	**RM-7888**

COMMENTS OF FREDERICK O. MAIA, W5YI

Frederick O. Maia, by his counsel, files these comments in the captioned proceeding. Mr. Maia is the licensee of station W5YI and he holds an Amateur Extra Class operator's license. Mr. Maia is also recognized by the Commission as a Volunteer-Examiner Coordinator (VEC). Mr. Maia has participated in numerous Commission rule making proceedings and his interest in the betterment of Amateur Radio is well known to the Commission.

1. In this proceeding, the Commission has proposed two rule changes that would enhance the privileges of the Novice Class operator by giving that class of licensee full operating privileges in the entire 222-225 MHz band. Considering the narrowing of the differences in operating privileges between the Novice Class license and the Technician Class license that this proceeding would bring about, the Commission has specifically asked for comment regarding the current amateur operator license class

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structure. (See footnote 6 of the Notice of Proposed Rule Making.)

2. Even before the Commission commenced the present proceeding, Mr. Maia had done in-depth historical research into the licensing structure of the Amateur Radio Service. He reached the conclusion that the licensing structure can and should be simplified. Mr. Maia writes a monthly column for CQ Magazine. His November, 1992 column, which summarizes his research and outlines a new license class structure and the steps necessary for its implementation, is attached hereto for the Commission's consideration.

3. Mr. Maia received over a thousand responses from readers of his November 1992 CQ column. The greater majority of them favored some sort of restructuring of the Amateur Service. Those in favor of reducing the number of license classes argued that the current glut of license classes necessitates an overly complex set of licensing requirements, prerequisite examinations, frequency sub-bands, and privileges accompanied by a needless administrative examination and licensing burden. Rather than authorizing the maximum number of qualified people to utilize Amateur spectrum, the current licensing program

creates an unnecessary aristocracy in part based on outdated technology.

4. There was widespread feeling that increasingly faster speeds of manual Morse proficiency should not be the primary yardstick used to determine qualifications in a radio service whose cornerstone is experimentation with modern communications technology. The higher speed telegraphy requirements present a barrier to those who choose to operate in other modes and on the maximum number of Amateur Service frequencies for which the applicants are qualified. A reduction in the number of telegraphy examinations would also bring the Amateur Service licensing requirements into line with those of the rest of the world.

5. Those opposed to reorganizing the Amateur Service believe that reducing the number of prerequisite examinations and license classes is comparable to reducing qualifications. They believe that the necessary effort involved in qualifying for a plethora of Amateur classes and attainment of the higher speed Morse requirements is related to operator quality and desirability and motivates increased communications knowledge.

6. Many are concerned that restructuring would bring about excessive frequency congestion which will result in disorder. There is also an unfortunate widespread attitude among operators who have qualified for the upper level licenses that a reduction or combining of Amateur Service license classes would be comparable to diluting or giving away the privileges they had to earn.

7. A more complete summary of reader reaction was contained in Mr. Maia's January, 1993 CQ column, a copy of which is attached. Mr. Maia's April, 1993, column, now at the printer's, will summarize the matter. A copy of this column is attached as well.

8. Mr. Maia realizes that a complete realignment of the licensing structure is beyond the scope of the present proceeding. In light of the Commission's specific question, however, the license structure with regard to the Novice and Technician classes can be considered.

9. In a nutshell, Mr. Maia suggests that the Novice and Technician class licenses be combined into one class, to be called the "Basic" class.

10. With the privileges in the 222-225 MHz band that this proceeding would bestow, very little distinction would remain between the Novice and Technician classes --- certainly not enough of a distinction to warrant the continued expenditure of FCC and VEC resources to maintain two license classes and what amounts to a third class, the Technician Plus.

11. If the rules proposed in this proceeding are adopted, Novices will have VHF voice privileges and the right to be repeater licensees and control operators. The only meaningful distinction left between the two classes would be the hf telegraphy privileges of the Novice license. By the simple expedient of transferring these telegraphy privileges to the next class (to be called the "Intermediate" Class in Mr. Maia's plan), the Novice and Technician Class licenses could be easily merged. The hf telegraphy privileges of existing Novices and Technician Pluses would, of course, be grandfathered indefinitely.

12. Mr. Maia recognizes that shifting the telegraphy privileges to another license class could impact the telegraphy entry path into Amateur Radio now afforded by the Novice Class. To minimize this impact, Mr. Maia's plan calls for the telegraphy testing requirement for the

Intermediate Class license to remain 5 wpm. True, the written examination would be harder and longer than the present written examinations for Novice and Technician, but that is one of the trade-offs to be made if a more efficient and realistic licensing structure is to be attained.

13. Moreover, the code-free entry path via the Technician Class license has proven so popular that the elimination of the slow-code entry path would not impact the vast majority of aspirants to the service. According to the Commission's own figures, approximately 75% of all newcomers to the service are entering via the Technician Class license. Approximately 24% of newcomers enter via the Novice Class license. The other license classes account for about 1% of new entrants.

14. Instead of regarding the respective license classes as a progression of privileges to which every licensee should aspire, the view should be that each class offers a particular array of privileges, which are useful in their own right. In other words, as a practical matter, individual licensees choose and qualify for the license that matches their interests and the licensing structure should reflect that fact. The arrangement of licenses in a

hierarchy is outmoded and needlessly consumes resources in order to perpetuate it.

15. The time has come for a re-thinking of the nature of the license classes and this proceeding is the place to begin.

Respectfully submitted,

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Appendices: November 1992 CQ article
January 1993 CQ article
April 1993 CQ article

November 1992

WASHINGTON READOUT
HAPPENINGS FROM THE WORLD OF AMATEUR RADIO

A monthly feature by:

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REALIGNMENT OF THE AMATEUR SERVICE
Is it time to simplify the licensing structure?

"...not all communications in the Amateur Radio Service must pertain to personal development. Recreational communications are permissible, as are many communications relating to matters of personal expediency and public welfare. The Commission's mandate to allocate frequencies in the public interest requires periodic re-examination of amateur radio service regulations and policies to determine whether they continue to serve the public interest." Working Paper No. 20, August 1986. Research project by James E. McNally, Jr., WB3APV, FCC Office of Plans and Policy

The United States has the most Amateur Radio license classes and examinations of any country in the world. You only have to check the international Radio Amateur Callbook to confirm that statement. Most countries seem to have three classes - usually a beginning class, a no-code VHF class and an all band class. Many nations also license ham club stations.

The United States now has what amounts to six license classes - Novice, Technician, Technician Plus Code, General, Advanced and Amateur Extra - which are granted by passing eight different written and telegraphy examinations. We question whether they are all necessary? Or in the public interest. It is my belief that the entire Amateur Service testing and licensing system is overly complex and are in need of simplification and reorganization.

The history of U.S. ham classes is a long and complicated one. Those of you that have been licensed since the sixties will remember the bedlam over Incentive licensing. This 1967 FCC program (which was supported by the American Radio Relay League) amounted to the last major realignment of the entire Amateur Service. It also re-established the Advanced Class ham license which had not been available for fifteen years.

Actually the FCC had originally proposed that a new Amateur First Class license would be the "...stepping stone to the highest class." Those amateurs who held the old Advanced ticket would be down-graded to the General ticket when they renewed. The new Amateur First Class license would require passing a 16 words-per-minute code test - mid-way between the 13 wpm General and 20 wpm Extra Class telegraphy requirements.

The FCC elected, however, to simply re-establish the Advanced Class which had not been available since 1952 and leave the code speed at 13. A controversial proposal to re-issue everyone new amateur call signs to denote their class of license was not implemented. But the

Commission did allow Amateur Extra Class licensees to select a preferential "two letter" call sign (which they characterized as the "mark of the old timer") upon payment of a $20 processing fee.

What did Incentive Licensing do?

Incentive licensing provided for new reserved phone and CW frequency blocks which would be available only to the Advanced and Amateur Extra Class. These new band segments represented the "incentive," the purpose of which was to motivate some 100,000 General Class licensees to learn more about electronics and upgrade their license. The prize for Extras was the exclusive use of the first 25 kilohertz of the 80, 40, 20 and 15 meter bands which continues to this day.

Actually Incentive Licensing had a major impact on every ham operator class. Novices both gained and lost. While they would now be allowed two-year non-renewable terms instead of one, they lost access to phone operation in the 145 to 147 MHz ham band ...not a big deal back then since two-meter repeaters had yet to emerge. Beginners were banished to CW only using crystal controlled 75-watt rigs.

The thinking behind deletion of Novice Class voice privileges was to force newcomers to develop more Morse code proficiency so that they could advance to the higher classes of license. Since then, of course, the Novice Class has evolved to just another renewable HF/VHF/UHF ticket authorizing both voice and code privileges.

Docket No. 15928 provided for seven examinations which continue to this day. (In 1987, Element 3 was split into 3(A) and 3(B) and we now have eight different examinations.) Effective November 22, 1967, all examinations had to be conducted by Commission personnel. The mail-order Technician and Conditional Class license were abolished. Only the Novice exam remained as a volunteer administered examination. Anyone who failed a test had to wait 30 days before applying again.

Incentive licensing, pro and con

The thought behind Incentive Licensing was that amateur radio should become a training ground technicians and engineers instead of a service of non-contributing hangers-on. If the incentive system worked, radio amateurs would once again contribute to American telecommunications.

Everything looked great until you checked the fine print in the final order released August 29, 1967. General Class frequencies were cut down. To get them back, you had to pass more tests and upgrade to Advanced and Extra. The average ham was outraged!

The result was absolute pandemonium among the General Class - far more than anyone thought possible. The American Radio Relay League was targeted as having not looked after the interests of the majority of ham operators. Membership nosedived. One thing became instantly apparent; the bulk of existing ham amateurs certainly did not think Incentive Licensing was a good idea.

Since 1967, of course, there have been other changes. The concept that the Novice Class would be a beginning temporary stage to introduce newcomers to the backbone of ham radio, Morse code, has given way to the permanent no-code Technician entry level. It is immensely popular. The number of applicants choosing the Novice path is now greatly diminished and the Technician Class is now, by far, the entry path of choice. And the amateur testing program has been turned over to the ham community ...another success story.

Has Incentive Licensing worked?

Going back through my records, I find that back in the late 1960's, personal - and not necessarily, amateur - communications were gaining in popularity. There was great concern that most technological strides were being made by industry and non-amateurs. Equipment construction was going out of style.

A system of forced motivation through government regulations - more radio privileges in exchange for more knowledge and proficiency - was believed to be the answer. The theory was that through Incentive Licensing, America could once again rely on hams for fresh ideas. Has it worked out that way?

Not according to research conducted by the FCC in 1981. Here's a quote from Working Paper No. 6 published by the Office of Plans and Policy. "The rules that exist today ...do far less than they could to encourage amateur ingenuity. ...in some cases, regulation may positively have discouraged technical progress."

The conclusion of the two researchers (both of whom licensed amateurs, one a professional engineer the other an economist) is to: "...propose a new regulatory approach ...with the fewest possible restrictions on users, uses and technologies, in order to allow innovation, technological change and maximum user choice." The answer appears to be in flexibility not in government regulations.

One can accurately argue that the condition that existed before Incentive Licensing in the late 1960's is still with us in the 90's ...only more so. Gone are the construction kits ...and gone are the majority of the companies that designed and manufactured electronic gear. Get out an old QST and see for yourself! Where are Hallicrafters, World Radio Laboratories, Harvey Radio, Hammarlund, National, Heathkits... and on and on.

Actually most early home-brewing was done out of necessity rather than for fun simply because mass-production of amateur gear had not yet arrived. Today, more than ever, most ham equipment is store bought by people who simply want to communicate. While some amateurs are still experimenting, the fact remains that nearly all technological innovation is accomplished by highly trained professionals and members of industry - agreed, many of whom are licensed amateurs. Gone are the vacuum tubes. Today's solid state components, digital techniques and telecommunications technology requires considerable training and education.

And the reasons why the public wants to communicate are numerous and legitimate. Ham radio exists for many reasons besides advancing the technical phases of the radio art. It is selfish and not in the public (or amateur radio's) interest to deny newcomers access to amateur spectrum simply because of the potential for congestion ...a potential that gets less and less as we explore the microwaves. Remember our frequencies are in great demand by others. I listen to the VHF and UHF bands as I travel throughout the United States. There appears to be little crowding even though more than 4,000 newcomers are joining the ranks monthly.

The most recent breakthroughs have come in the area of solid-state devices, software engineering, high-tech telecommunications modes and computers. One can only wonder what would have happened if the early digital tinkerers had been allowed to experiment with all digital codes and electromagnetic transfer of data rather than by landline. They certainly were amateurs, although not radio amateurs. They should have been ...and would have been had our technical and entrance rules permitted then easier access to the spectrum.

The answer may be just that. Change the rules to allow the more widespread use of radio. Less amateur license classes and examinations is a start. Let the amateur community and public

determine their direction through flexibility.

Does America need six amateur service license classes with eight different examinations? I think not. I know of no other radio service ...or any other licensed activity for that matter - that requires such a complicated series of certification terms. It appears Incentive Licensing has not brought about the desired result envisioned in the sixties. And it is irrational and ridiculous to require the radio professionals to demonstrate less competence than the amateur - but such is the case in ham radio.

How do we start?

Any changes to the licensing structure must take a multitude of things into consideration. Reducing the number of ham classes (and examinations) must be orderly and carefully thought out since every area of the hobby is affected. The activities, desires and requirements of existing operators, volunteer examiners, the public, international radio law and government must all be weighed. Ideally, there should be a benefit to everyone without a loss of privileges.

Canada simplified and restructured their Amateur Service two years ago. They now have what amounts to four license classes granted by four examinations which they call "qualification levels." (Two written exams, basic and advanced radio theory and two code, 5 and 12 words-per-minute.) The license classes are no-code BASIC, BASIC w/5 wpm code, BASIC w/12 wpm code and ADVANCED. The two theory tests are 100 questions; pass mark is 60.

The Basic (beginning no-code) qualification allows operation on all ham bands above 30 MHz. Basic amateurs who pass a 5 WPM telegraphy exam gain access to the lower (80 and 160 meter) HF ham bands - all modes; 12 WPM allows 40 though 10 meter band operation. Passing the Advanced theory permits a 1 KW power level (all other classes permit 250 watts) and the right to sponsor repeater and club stations, operate remote control fixed stations and design and build transmitting equipment.

I have given a lot of thought to simplifying and restructuring the U.S. amateur service. One way this might be accomplished is to reduce the number of license classes from six to three and examinations from eight to five by: (See Table No. 1)

(1.) Combining the Novice and Technician to a BASIC Class.
(2.) General would become the INTERMEDIATE Class except the code requirement would be 5 wpm.
(3.) Advanced and Extra Class would be combined into an EXPERT Class with 13 wpm telegraphy.
(4.) The three written examinations would be 50 questions each.

Table No. 1
Simplification and Reorganization of the U.S. Amateur Service

REQUIREMENTS	CURRENT QUESTIONS & CODE			"BASIC" QUESTIONS/CODE		
	NOVICE	30	5 wpm	BASIC	50	No Code
	TECHNICIAN	25	-	Group D call signs (2-by-3)		

PRIVILEGES	**CURRENT PRIVILEGES** NOVICE 80/40/15/10M CW 10M/1.25M/23cm Phone TECHNICIAN All modes/emissions 6M and higher	**"BASIC" PRIVILEGES** BASIC All modes/emissions 6M and higher (Current Novices and Technicians become BASIC with current privileges "Grandfathered." Existing Novice/Tech license renewed BASIC.)
REQUIREMENTS	**CURRENT QUESTIONS & CODE** GENERAL 25 13 wpm	**"INTERMEDIATE" QUESTIONS/CODE** INTERMEDIATE 50 5 wpm Group C call signs (if available - otherwise Group D.)
PRIVILEGES	**CURRENT PRIVILEGES** GENERAL Portions of all bands	**"INTERMEDIATE" PRIVILEGES** INTERMEDIATE All current General privileges (Novices and Tech Plus pass only written test to become an INTERMEDIATE amateur.)
REQUIREMENTS	**CURRENT QUESTIONS & CODE** ADVANCED 50 13 wpm EXTRA 40 20 wpm	**"EXPERT" QUESTIONS & CODE** EXPERT 50 13 wpm Group A call signs (if available - otherwise Group B.)
PRIVILEGES	**CURRENT PRIVILEGES** ADVANCED Most of all bands except certain small segments EXTRA All amateur bands, modes and emissions	**"AMATEUR" PRIVILEGES** EXPERT All amateur privileges (Advanced pass only written test to become EXPERT)

One way the U.S. Amateur Service could be simplified is to combine Novice/Technician and Advanced/Amateur Extra into single classes.

Impact on Amateur Community

Novices and Technicians with 5 wpm code credit would only have to pass a 50 question INTERMEDIATE multiple choice test to upgrade to what is now the General Class level. Current General and Advanced Class amateurs would pass the 50 question EXPERT written test to receive full amateur privileges. There would be no further telegraphy requirement for these amateurs. This should prove attractive to existing licensees since ninety percent of all amateurs hold Novice through Advanced Class licenses. The 20 words-per-minute telegraphy examination could still be made optionally available by VE's if individual amateurs deem it important to their self-esteem.

The major objection to any realignment or lessening of requirements will come from those amateurs, especially the Amateur Extra Class level. James E. McNally, Jr, (WB3APV and a senior engineer with the FCC's Office of Plans and Policy) addressed these objections in his August 1986 research project, *Alternatives for Improved Personal Communications.* He said:

"Another possible explanation for questionable barriers to entry in the Amateur Radio Service is that those who have attained the higher license classes with some level of difficulty would naturally object to rule changes that would have the effect of making access to their operating privileges easier. This attitude, while understandable, is nevertheless unreasonable and it acts to inhibit meaningful restructuring of the service consistent with current circumstances. Another obstacle to worthwhile reregulation may be based on the belief of current licensees that otherwise inappropriate barriers to access should be retained in order to inhibit frequency congestion."

Impact on Volunteer Examiner System

Having less amateur operator examinations to administer would beneficially affect the workload of the VEC System. At present, the VEC's Question Pool Committee (QPC) revises question pools on a four year basis. (Your author, Fred Maia W5YI, is Vice Chairman of that three member committee.) The Novice and Technician pool are reviewed at the same time since they are the sole requirement for the Codeless Technician entry level. If there were only three question pools, the review sequence could be reduced to a three year cycle.

The current questions would be utilized, but the written test question pools would be reduced to three and renamed BASIC (Element 2), INTERMEDIATE (Element 3) and EXPERT (Element 4) - instead of 2, 3A, 3B, 4A and 4B. A portion of the current Advanced pool would be relocated to the "INTERMEDIATE" pool by the Question Pool Committee with the balance going to the "EXPERT" pool.

Specifically, all Element 2 and 3A questions would be combined to form the new BASIC question pool. The current Element 3B (General) and approximately 300 of the questions in the 4A (Advanced) would form the new INTERMEDIATE pool. The EXPERT question pool would consist of the balance (207) of the Element 4A (Advanced) questions and all current Element 4B questions. (See Table 3)

Table No 3

Adjustment of the Examination Questions to Accommodate Realigned Amateur Service

There are currently:	370 questions in Element 2 (Novice),
	325 in Element 3A (Technician),
	286 in Element 3B (General),
	507 in Element 4A (Advanced) and;
	438 in Element 4B (Extra) pools.
TOTAL:	1926 questions in all pools
New question pools:	695 questions in new BASIC Class,
	586 questions in new AMATEUR Class and,
	645 questions in new EXPERT Class.
TOTAL:	1926 questions

The Novice and Technician pools would be merged into a BASIC question pool. Some questions taken from the Advanced pool would supplement the General Class pool to form the INTERMEDIATE pool. The balance of the Advanced pool plus all questions in the Amateur Extra Class pool would become the EXPERT pool.

The number of questions could be further reduced to nearer the "... at least ten times the number of questions required for a single examination" (§97.523) during the VEC's Question Pool Committee's regularly scheduled revisions.

Modern transmitting equipment certainly is now universally available and used which lessen the need for new applicants to be examined on electrical principles, circuits and basic electronics. Emphasis needs to be placed in the areas that are more appropriate to the planned operation of newcomers - especially on rules, operating procedures and amateur radio practices.

The Part 97 rules currently require that each examination contain a specified number of examination questions on each of nine topics. Accordingly, it has been QPC practice to provide at least ten times the number of questions required in each subelement for possible selection by volunteer examiners. The QPC should have the flexibility to stress certain topics and is considering asking the FCC to remove the restrictions contained in section §97.503(c).

While current questions would be used at first, the syllabus should eventually be reworked to better reflect the activities and knowledge required of BASIC, INTERMEDIATE and EXPERT amateurs. This would be completed during routine pool revision by the Question Pool Committee. The syllabus of the BASIC pool should be oriented towards Rules, Operating Procedures, Amateur Radio Practices and Amateur Radio Equipment as applies to VHF and higher frequency operation. The INTERMEDIATE questions should be oriented towards all band operation, volunteer examination of the BASIC Class ...with some electronics questions. The EXPERT examination should be highly technical and contain questions on examination of all classes. (See Table No. 2)

Note that the new INTERMEDIATE Class offers the same privileges as the General Class, yet the number of examination questions is increased from 25 to 50. On the other hand, this is balanced by the fact that no additional telegraphy requirements are imposed. Furthermore, additional questions concerning the examination of BASIC amateurs may be required. Ideally, to have minimum impact of license preparation publishers, the implementation date of any amateur service realignment should be July 1, 1994, when the *Question Pool Committee* is scheduled to activate new General Class questions.

In keeping with the availability of modern digital equipment and technology trends towards electronic rather than aural (manual) receipt of digital communications, there would be no 20 words-per-minute telegraphy requirement. Again, it should be pointed out that Canada reduced their 10 and 15 words-per-minute telegraphy requirement to 5 and 12 words-per-minute on October 1, 1990.

Table No. 2
Impact of realignment on VEC Examination System

	EXISTING TESTS Element No.		PROPOSED TESTS New Element No.	
Telegraphy Exams:	1A	5 wpm	1A	5 wpm
	1B	13 wpm	1B	13 wpm
	1C	20 wpm	[1C	Not required, but could be available if amateur/ VE community desired.]
Written Theory Exams:	2	Novice (30 questions)	2&3(A)	to BASIC pool (50 questions)

Written Theory Exams:	3A	Technician (25 questions	(Pool: 695 questions)
	3B	General (25 questions)	3(B) & some 4(A) to INTERMEDIATE (50 questions) (Pool: 586 questions)
	4A	Advanced (50 questions)	Some 4(A) & 4(B) to EXPERT (50 questions)
	4B	Extra Class (40 questions)	(Pool: 645 questions)
TOTAL QUESTIONS:	170 Questions (Current) Pool: 1926 questions		150 Questions (Proposed) Pool: 1926 questions

The current five (Novice, Technician, General, Advanced and Extra Class) question pools would be realigned into three question pools, BASIC, INTERMEDIATE and EXPERT.

Impact on government and international law

The FCC should find attractive any reduction in the number of amateur radio operator licenses which results in fewer different licenses having to be issued. Reducing the number of license classes from five to three could result in approximately 15,000 less operator applications being processed for operator licenses annually. This, of course, could be balanced by more licenses being issued for the new Intermediate and Expert Class since it could be argued that these license classes might be easier to attain due to a reduction in telegraphy speed requirements.

We note from the remarks given by Ralph Haller at the *VEC Conference* in Gettysburg, Pennsylvania, this past June that the FCC is in the process of rewriting computer software to provide for special amateur service station licenses and/or call signs. The Commission should consider adding software capability to change the name of existing license classes or a provision which would later permit a reorganization of amateur service licensing.

It appears to us that the Commission's data processing equipment should be able to easily merge the Novice and Technician data base into a BASIC Class - rename the General Class to INTERMEDIATE, and combine the Advanced and Amateur Extra Class to the EXPERT level without incurring major computer software reprogramming expense.

The suggested new realignment conforms to international requirements which requires telegraphy knowledge when the radio operation takes place below 30 MHz.

So there you have it!

This proposal is not perfect, but it does provide attractive benefits to potential and existing amateur licensees, volunteer examiners and the Government whose resources are limited. It can be easily implemented quickly ...and with a minimum of disruption to testing, licensing or operator activities.

It grants all Novice (who have been tested on some VHF operation) and Technician licensees full BASIC privileges, i.e. all frequencies/modes above 6M, without further testing. Novices and Technicians with 5 wpm code credit can upgrade to INTERMEDIATE by passing only a written examination. General and Advanced Class licensees who have passed 13 wpm code would be able to upgrade to EXPERT by passing only a 50 question examination.

I recently wrote the Federal Communications Commission inquiring if they would be receptive to a suggestion to decrease the number of amateur operator license classes to simplify examination administration and license processing. John B. Johnston, Chief of the FCC's Personal Radio Branch, responded by saying:

"The Commission has a goal to provide excellent service to the public in the most efficient, uncomplicated, timely and courteous manner possible. Your suggestion would require significant changes to the existing amateur operator license class structure, requirements, and privileges. These matters have been the subject of numerous rule making proceedings that generated many thousands of comments from the amateur service community. After considering the views expressed, the Commission adopted the rules which are now codified in Part 97. The current operator license classes, requirements, and privileges, therefore, were developed in accordance with the expressed desires of the amateur community to provide motivation for amateur operators to advance their communication and technical skills."

"To justify the initiation of a rule making proceeding to revisit these contentious issues would require convincing evidence that a large segment of the amateur service community desires to alter the current license structure in a specific manner or that it is failing to allow the service to fulfill its basis and purpose."

So how do you feel about the proposal?

Somehow (and I am not sure how), Neal Zipper, KD4EGE, of Bradenton, Florida, heard that we were "floating" an idea to eliminate two of the five amateur radio license classes and the 20 wpm telegraphy examination. We wrote him back of the above proposal and his response was interesting. What he did was start a grass roots support campaign within the amateur community! Neal had hundreds of postcard sized cards printed up which said:

"I am an amateur radio operator and support the proposed W5YI proposal outlined below:

"Combine the Novice and Technician to a BASIC Class. Privileges would be all spectrum above 30 MHz with all modes and emissions. Current Novices and Technicians would be 'grandfathered' into current privileges indefinitely.

"General would become the INTERMEDIATE Class. Privileges would be the same as now except the code requirement would be 5 wpm."

"Advanced and Extra Class would be combined into an EXPERT Class. Privileges would be those of the current Advanced and Extra Class except a 13 wpm telegraphy requirement. Each written examination would be 50 questions. (Three in all.)"

He left a space for the amateur to sign the postcard and fill in his address. The reverse side of

the postcard is a return address to W5YI. The amateur simply mails the card back to us. We have already received dozens of these cards from licensed amateurs in Florida backing the concept.

How do you and your ham club feel about simplifying and reorganizing the Amateur Service? If you agree with the concept, why don't you too start a campaign to register supporters similar to what KD4EGE did? We will proceed with a petition to the FCC for rule making if we get enough cards indicating widespread support within the amateur community for this proposal.

We would be interested in all comments - both for and against. Send to: The W5YI Group, P.O. Box 565101, Dallas, Texas 75356. Our phone number is (817) 461-6443 if you want to talk to us. 73. See you next month.

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January 1993

WASHINGTON READOUT
HAPPENINGS FROM THE WORLD OF AMATEUR RADIO

A monthly feature by:

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REALIGNING THE AMATEUR SERVICE

Amateurs respond to controversial issue!

No CQ column has created as much controversy among the ham community as the one we did for the November 1992 issue suggesting that it might be time to streamline the Amateur Service. You will remember that we floated an idea which would reduce the number of ham classes from six to three - and license examinations from eight to five.

Due to production lead time, it is necessary that I submit this column to my editor six weeks ahead of the date that the magazine will be distributed. So even though this is the January 1993 issue, I am writing this column on Monday November 2nd. This issue should appear in your mailbox somewhere around the third week in December. I bring this to your attention only to emphasize that the November issue has only been "out there" for just a couple of weeks - and, by far, the majority of responses have yet to come. But I have gotten dozens and dozens of replies already, enough to pretty much know where the amateur community stands on the issue.

Before we go amateur reaction to realigning the U.S. amateur service, we feel it appropriate to tell those who may not have seen the November issue just what this is all about.

The United States has the most Amateur Radio license classes and qualifying license examinations of any country in the world. Most countries seem to have three classes - usually a beginning class, a no-code VHF class and an all band class. We have what amounts to six license classes - Novice, Technician, Technician Plus Code, General, Advanced and Amateur Extra - which are granted by passing eight different written and telegraphy examinations. We wondered if they are all necessary? We said that we thought the entire Amateur Service testing and licensing system had gotten overly complex and are in need of simplification and reorganization.

It has been some twenty-five years since the last major overhaul of U.S. ham classes. Supported by the American Radio Relay League, the FCC's infamous 1967 Incentive Licensing program changed ham radio from one of communications to that of electronics education. Amateur Radio would now provide for the forced training of technicians and engineers.

Basically the objective of Incentive Licensing was to get the lethargic General Class amateur off his duff and learn something. The Advanced Class license was re-established and new reserved phone and CW frequency blocks were made available only to the Advanced and Amateur Extra Class. These new band segments represented the "incentive." The new program affected every class and as a whole, existing amateurs lost frequency and operating rights. If you got more proficient at ham radio, you got them back. It didn't go over well at all.

The Incentive Licensing Docket No. 15928 (released August 29, 1967) provided for seven examinations which conferred five license levels. In 1987, Element 3 was split into 3(A) and 3(B) and we now have eight different examinations. And due to 1991's No-Code proceeding, there are now six different ham radio classes. As you no doubt know, we now have both code and no-code Technician versions.

Was Incentive Licensing accepted by the Amateur community back then. Absolutely not! Actually the average amateur was outraged. And how it has worked out since then? It apparently has not. The same problems given as the reason behind Incentive Licensing still exist today ...only more so.

Today, ham radio is a different ball game. The entry level is now the no-code Technician and not the Novice Class. The number of applicants choosing the Novice "code" path is now drastically reduced. We have to give the FCC credit where credit is due. They wanted to abolish the Novice class and let beginning hams learn the code later. While we all (myself included) opposed that position, it appears that is exactly what new hams are doing!

FCC statistics for Fiscal-1992 shows 40% less newcomers chose the Novice route than the previous year. Those beginning at the Technician level, however, has more than doubled. Clearly, the newcomer is choosing no-code entry into the hobby. And they are learning the code later just as the Commission predicted. The number of amateurs upgrading to the General Class and higher is at an all time high.

The big question is does America need six amateur license classes conferred by eight examinations. In November I floated an idea that would reduce the number of ham licenses to three and examinations to five. I also showed how this could be easily and legally implemented without upsetting the current licensing and examination programs or infuriating existing amateurs. Canada greatly simplified and restructured their Amateur Service two years ago.

I said one way restructuring might be accomplished is to reduce the number of license classes from six to three and examinations from eight to five by:

(1.) Combining the Novice and Technician to a no-code BASIC Class.
(2.) General would become the INTERMEDIATE Class except the code requirement would be 5 wpm.
(3.) Advanced and Extra Class would be combined into an EXPERT Class with 13 wpm telegraphy.
(4.) The three written examinations would be 50 questions each. The current question pools would be combined and used.

Mail and phone calls galore!

I asked November readers of this publication to tell us how they felt about reducing the complexity of the U.S. Amateur Radio licensing structure. Well, a bunch of amateurs were inspired to take pen in hand to tell us ...and some in no uncertain terms! As of this writing, the November issue has just "hit the street" but we have already gotten over 150 pieces of mail and phone calls. Every day, they come in!

Many of them were just simple QSL postcard type messages in agreement (or disagreement) such as from Bob/W4NWF of Venice, FL. Bob (who holds QCWA membership No. 3562 and OOTC No. 122 going back some 60 years) simply said "Fred, I agree with your realignment proposal for licenses." But we also got a lot of well argued letters and phone calls, too. Here is a representative sampling.

"We need to do as the FAA has done and begin a program of periodic proficiency reviews to retain the privilege (not right) of using the Amateur Radio Service. Pilots have a two year obligation to prove their skills and knowledge to a certified flight instructor to retain their flying privileges.

"If CW was half as important as claimed, we should be required to periodically demonstrate our CW skills, regulations and theory knowledge... There are only four license levels for pilots and two of those are really professional rather than private licenses. The lowest license, recreational, requires the basic skills for local flight and [licensees are] prohibited from leaving a fifty mile radius. This corresponds rather well to the VHF privileges of the current no code license. The private rating allows the pilot to fly a U.S. registered aircraft anywhere in the world ...worldwide communications if you will.

"The purpose of amateur radio is not the enjoyment of the operators, that is a side benefit, but to meet several vital national interests. Those would be enhanced by your proposal. I have been licensed for 12 years and also hold foreign license YN1LCB." ...**Larry/KA5HKR, Jackson, MS**

"Forget the names [Basic, Intermediate, Expert]. It is far better to call them Class I, II, III; or Class A, B, C. I believe Germany has but one test, with the class of license determined by how many questions are answered correctly. That would simplify matters, for sure. I believe an "Intermediate" should hold their license at least twelve months before becoming eligible to hold an "Expert" license. The person could take the exams at any time, but the privileges could not be used until the time limit is passed.

"I am sick and tired of dealing with Amateur Extras and Advanced licensees who know nothing or little about operating. The theory would have to be fairly tough and appropriate to today's usage. Incentive licensing almost stopped Amateur Radio growth in its tracks and alienated many Generals at the time. My major concern is your program may lower technical requirements. While the no-code license was at least thirty years overdue, let's not make it too easy to get a higher class license." ...**Robert/AAØCY (ex WN2MCB, 4X6FY, KT2D), Littleton, CO.**

"I wish to write representing many very upset amateur radio operators who, like me, have survived the back-stabbing Incentive Licensing fiasco of the sixties which blatantly 'removed' our privileges and caused countless good hams I'd known to sell their equipment and quit. To this day there remains a bad taste for what occurred.

Are Extra Class hams any better than Advanced or General? Listen to the Extras on 14.313 or 14.205 MHz or all across 20 and 75 meters for that matter.

This proposal of yours has turned the local repeater into chaos. Everyone's afraid of what happened in the sixties. I'll be darn if I want to lose my privileges again. *(Editor's note: Actually no*

one loses privileges - all existing privileges would be "grandfathered." To become an "Expert" however, an Advanced would have to pass Element 4(B).)

Has Incentive Licensing worked? Everyone associated with the hobby over 15 years or so knows very well it has failed in every way. If it were my idea, I'd grandfather all the Generals with 20 plus years experience along with all Advanced and Extras into one class. In doing so there would be at least some retribution for past privileges lost and a feeling of 'OK, someone cares and is trying to help bring us back together again. Incentive Licensing divided us when we once walked together as one." **...Steve/K3DEM, Bethlehem, PA**

"Stop trying to fix what isn't broken! Amateur radio is no different than any other club or organization. You have to do certain things to stay a member or to join a group. 'New' may work better, but old is more fun. Leave it alone." **...Anonymous/Unsigned.**

"It is our belief that CW is an archaic and totally outmoded form of communication which is now hindering the expansion of the Amateur Radio Service. It is also our belief that many people are just not able to advance in the skill of CW despite years of practice. I have been a licensed Technician for over 15 years. After countless hours of practice, I can still not pass 13 wpm. I've already taken the test 5 times this year. Due to my CW inability, I am banned from operating voice on all amateur HF frequencies save for the small sliver on 10 meters which I actively use. I know of several people who are now obtaining 'disability' waivers to avoid having to pass CW tests. Many of these people are hardly disabled unless you consider them to have CW learning disabilities. I have owned and maintained a 220 MHz repeater for nearly 15 years. I have WAS on 10m SSB and have received the ARRL Public Service Award for disaster communications - all as a Tech.

We are fully aware that some of the 'old guard' still clings to CW as a 'right of passage' to keep the lids, kids and space cadets out of the hobby. But if you listen to all the garbage currently on HF and look up the license class of the 'problem' operators, you will find that many are Advanced and even Extra class operators. This surely kills the argument. We certainly feel that 5 wpm is more than adequate to fulfill the international treaty requirements for HF operation.." **...Tom/WB8VMI, Lexington, KY.**

"I agree with you completely, The whole procedure has gotten ridiculous in its complexity. Let's get it simple and straight forward again. I was first licensed in 1939 when there was only two grades of privileges. It worked then and it should work again now."
...Robert/W9BAR, Eau Claire, WI

"I have read some of your other articles, most of which I didn't like either. It seems to me, for whatever perverted reason, you want to give the ham bands away to a bunch of illiterates. ...it would be nice if they could at least own a soldering iron and attach their own coax connectors... I have talked with many other people that say there is little or no intelligent life between .3 and .5 on 28 MHz and on 2 meter FM. These are the same duds that you want to give the ham bands away to. Keep the ham bands the way they are." **...John/WAØDYU, Pocatello, ID**

"I want to express my displeasure with the complete idea, but approval partially to help any streamlining that may be needed. My age is 67 years old and I got started in ham radio at age 66. I passed my 20 wpm and Extra written exam on Sept. 5, 1992.

"I worked and worked and sweat blood to get all the code and math required to pass all the

tests and proud to have been able to do it. When you work hard to obtain a goal you appreciate it more than if you don't.

"At the current rate new licenses are being issued, all frequencies will be completely overrun very soon. If you aren't careful, ham radio will be like CB radio. There is already a lot of bad apples on the air.

"I do not object to your three new question pools or licenses, only that to obtain them, should not come easy and band access should not change significantly from what it is now. Personally, I do not like CW but in order to obtain 'Expert,' I feel 18 to 20 wpm should be part of the requirement." **...Wally/NØPMI, Rogersville, MO**

"I am all for it and so are twelve other senior citizens I know. I am 78 and it is very difficult [for me] to get the 13 wpm code test. I enjoy 10 meter phone and I hear hams calling CQ on 15 and 20 meters and I can not reply. Not every General uses the code... As long as we can pass 5 wpm, that should be enough. Hams today have top equipment and do not have to be radio engineers." **...San/N9MHM, Northbrook, IL**

"The present system is needlessly complicated... My guess is there is going to be strong opposition from the 'Old Timers'. But perhaps enough new blood will be heard to accomplish something. I was originally WN3FZY back in 1956, then K4PCN and later K1RNS. I have just gotten back after a 25 year vacation as N8OEE. Am a Tech with a BSEE. **...Tom/N8OEE, Kent, OH**

"It is about time people like you should stop playing with the lives of amateur radio operators such as what you have been trying to do over the years. ...I did not become a radio amateur until the age of 42 years. I obtained a Novice call (WN2OZW) and a Technician license which I never used. I am now 70 years old and believe any change from an Incentive Licensing type structure and making it easier to obtain a ticket would crowd the bands and make this another CB band. Listen anywhere between 26 and 28 MHz when the band is open. I feel strongly we should pay a reasonable fee and this money should go directly to the FCC and not to the General Fund. This money should be used to examine all grades of licensing.

"Morse code ...is another language to most of us. Its ability to get through is a documented fact. Downgrading 20 wpm to 13 wpm is not the answer and giving the candy store away to others just to simplify the testing system does not ring true in my thinking. When one sends and receives 30 to 35 wpm with QSK (full break in) it is a different world. Why screw up the first 25 kHz on most bands? Listen to those sending with new Amateur Extra calls. Many sound [like] they should be on the Novice portion. Stop playing God for us Amateurs." **...Paul/K2OZ, Park Ridge, N.J.**

"Recently several of us had been discussing that very subject. We thought the FCC should streamline the licensing classes. It will make it easier to understand who has what privileges and it is bound to help the FCC with administration with less classes to keep up with. It certainly would make the classes more in line with real world operating. Good luck with the proposal. I am sure there will be a lot of opposition from the 'I had to do it so you should have to do it' group. I agree with your proposal, although I am not sure it might not be better to go with two classes - code and codeless; but I am sure that would have even more opposition." **...Dennis/N4ZHR. (M.D.) Tullahoma, TN.**

"Every now and then, someone begets an idea that makes so much sense that we all wish we had given birth to it! Your treatise on the reorganization of Amateur licensing in the November issue

of CQ is such a bombshell!

"Oh, I can already hear the 'old boys' saying that it will mean the end of Amateur Radio, and moaning about the demise of 'real QSOs.' But they are wrong again, just as they were wrong about no-code licensing. The 'flood' of new guys into the Amateur ranks via the no-code has been good for the hobby, bringing in people who have good ideas, have quickly learned good habits, and are not the ones who attempt to ruin a QSO by illegally interfering. It has been a shameful blot on the hobby that the ones caught in such miserable activity by the FCC have been long time licensed hams... I don't dislike CW operation, I just do it the modern way with a computer." **...Wil/N6FNR, Boise, ID.**

"Five classes of licenses is unnecessary and always has been. My support is not selfish. I have no real need or desire to upgrade. I am a Tech Plus currently. The time for a national revamp is NOW!" **...Mac/KB8FNQ, Columbus, OH, VP Madison County Amateur Radio Club**

"I was licensed in 1958 as Technician Class at that time requiring 5 wpm code and the full written General test. I think the restructuring as you stated will give both new prospective and old hams greater access to friends throughout the world. Thanks for a great article! I hope this article will bring you a few thousand letters." **...Burt/K8SNT, Coconut Creek, FL**

"I have felt for many years that the present set up of incentive licensing has been wrong right from its original start in the 60's. Many of my friends are still General Class because they feel that losing the privileges that once had was an insult to their intelligence. In effect, one day smart and the next day stupid. Myself, all I had to do was go take the exam. No study was required for me to pass. However, I lost a day's work and pay. I have never forgiven the ARRL for this stupid program of incentive licensing. It has not and will not accomplish a thing." **...Ken/KN2A, San Jose, CA**

"I worked for 7 years to upgrade from Advanced to Extra Class. I finally completed the last hurdle in March when I passed the code test after several unsuccessful tries. Now you, and others like you, want to take it away from me, or at least cheapen my accomplishment, by giving away what I had to work for, to all existing Advanced Class. I say, enough is enough! Your proposal is a great example of what is wrong with this country today. Those who are not willing or motivated to work for what they want, are constantly calling for lower standards. I sincerely hope that your proposal falls on deaf ears for the sake of the Amateur Service. Unfortunately, this proposal will appeal to many who stand to gain something for nothing. The real loser is the Amateur Service and our country's reputation. This is but one more step towards making this country second rate." **Jack/K7EHI, Ogden UT**

"I believe that while incentive licensing is not all bad, the present structure has not been as conducive to amateur radio growth as intended. Thus its time to take some corrective measures.

"Reducing the classes of licenses from 6 to 3 is a worthwhile step and your suggestions for re-arranging and combining seem reasonable. And dropping the 20 wpm code requirement leaving 5 wpm and 13 wpm in place is a laudable move. Personally, I have been a ham for 60 years and hold an Advanced Class ticket and am fully prepared to take the Extra Class written exam and can reasonably copy 20 wpm. But being 75 years of age, I cannot write fast or legibly enough to put down the full text being sent at 20 wpm so I have not taken the Extra Class exam. Frankly, many hams feel as I do that 20, 25 or 30 wpm is fine if you are an ardent CW'er but not a necessary skill for a quality Amateur Radio Service, especially in today's technical environment. Good luck with your efforts and thanks for having the best interests of Amateur Radio at heart." **...Keith/W5SQS, Buchanan Dam, TX**

"Having passed my Extra Class exams at the age of 69, I consider this license readily attainable by anyone with a serious interest in ham radio. The key word is 'serious.' Softening of the requirements for the various classes of licenses will not develop the quality of the radio ham, merely increase the number of equipment operators. Getting a ticket today is far different from getting one in 1946 when I got my Class B ticket ...having to drive all night to get to the Federal Building in Buffalo, NY to take the FCC administered exam. The code test was 10 wpm and we had essay type questions and drew circuits. Making the tests any easier is going to put more QRM on the bands, not grow a crop of smarter and more capable hams. The No-Code ticket is as far as we should go on simplifying getting a ham ticket. Let's drop this license revision idea ...FAST!!!" **...Carl/W2RWH, Leesburg, FL**

"I am writing to say that I completely agree with the conclusions you reached in your article. You make the case well that the Amateur Radio Service has evolved dramatically over the years, and the current state of equipment and new modes of communications is far different from the early days of radio. CW is no longer the mainstay of communications in the Amateur Service and as such, should no longer be the artificial barrier to upgrading one's license. Certainly there will be those who believe that the lessening of this requirement will open the floodgate [of beginners who will use] the sacred air space of those who had to master CW.

"Current realities of communications are such that the Amateur Radio community must take action to safeguard and guarantee the lifeblood of our service, our frequencies granted by the FCC. It is clear that the existence of our frequency privileges is contingent upon our use of them and moreover upon the future commercial demands outside of Amateur Radio for access to them.

"I am now looking forward to taking the test for a General license. Out of necessity I have worked for months to improve my proficiency at sending and copying CW. I have to confess that I now get more enjoyment out of CW than talking on Phone. So true to the original objectives of incentive licensing, I'm working to develop my skills so that I may gain greater access to the various bands available to General and higher licenses. Yet, having said this, I still come to the conclusion that providing broader access to HF without the code barrier would be an ideal way to expand the use of those frequencies." **...Doug/KB5SZZ, Socorro, NM**

"After reading your article in CQ, I can't help but wonder just what our hobby will be like in years to come. ...it always appears that obtaining an amateur license is getting easier. I've seen Novices get voice privileges of HF and no-code licenses. Years ago, when tested by the FCC, you really needed an understanding of electronic theory as well as knowing the code ...rather than just studying questions and answers in a book. I believe a license is something that is worth working for, and not just handed out. To me, it seems that is the direction in which the amateur community is headed and it worries me. I used to be a CB'er many years ago and I don't want to see the hobby I enjoy so much going in that direction. **...Joe/KA3CNC, Levittown, PA**

"I have been in ham radio since the 1930's and have written many articles for ARRL in both QST and the Handbook. Most of the vacuum tube amplifiers in the handbook over the past 15 years have been built and designed by me. This is in no way tooting my own horn but to show you I have some technical background.

"I concur 100% with your thoughts. I was against the present incentive licensing program from the start as being more of an ego trip than an incentive. I am sure you can get full support from QCWA and other groups. I suspect that QCWA can come up with some additional ideas for you to ponder." **...Dick/W1QWJ, Winchester, NH**

"My main crusade is for a truly technically oriented Amateur Radio much more consistent with the art and science of wireless. The ideal with current allocations would be a two class structure. First, a 50 MHz and up, no-code [license] with a written test difficulty of Extra as the Basic Class. Then a second [class] for all bands with a stiffer test, also no-code. Since my childhood, the service has been a dear interest, but one that missed its potential and I've lost heart in it." **...Lee/N3LC, Lorton, VA**

"Let's go one more step, a no-code class and a code class, Period! International rules state that only a knowledge of code is needed for an amateur radio license, 5 wpm in most countries. I was first licensed in 1970 as WN4WUQ, then as a Tech as W4WUQ. The garbage I hear on the low bands, language, attitudes, etc., has played a big role to keep me from going on and upgrading over the years. CW plays an important part in the operating I do on VHF, UHF and SHF ...especially on moon bounce. There is, however, not an importance on how fast I can go, but the accuracy of the contact!

"The majority of traffic being passed in today's radio communications is not CW but packet. There is more accuracy in packet than CW ever knew. Today's appliance operators don't need a skill of fast CW to plug in a radio and start talking." **...Dalton/N4OYS, Murfreesboro, TN.**

"I'm here to tell you that I'm fed up with this kind of foolishness! America in general is becoming illiterate and selfish in it's policies. Selfish meaning that anyone should (and can) get whatever they want, whenever they want it. Most hams who are active in the hobby do not like anything that has happened with the licensing structure to date. Those who operate on anything but 2-meters, which is an 11-meter extension thanks to you and your co-horts, are dead against an easier path towards licensing. We are tired with guys like you cheapening the system." **...Patrick/KM5L, Lancaster, TX**

"Will miracles ever cease! Finally some one has seen the light regarding amateur radio exams as they are now composed. [We should] stop trying to make mathematical geniuses instead of Amateur Radio operators. There is a need for basic electrical knowledge and how to apply it to antennas, TVI/RFI and operating procedures. With today's vast commercial developments, however, who in heaven's name even thinks he can build a rig. It's time for a change and convincing the League will be a huge obstacle... I am in complete support of your proposal to restructure license exams..." **...Gene/WA6HAD, Los Gatos, CA**

"When I tune around the bands, I hear any number of explicit sexual acts being described and kidded about, people, for lack of the English language, cursing in every sentence they utter, arguments falling short of a fist fight, injections of perversion in QSOs, people who go around jamming QSOs and nets, out of license class operation... The greater majority are Generals and Advanced. I will oppose any petition through my Congressman and Senator to bring or unite my class of license with any lower class." **...Harry/NI4P, Robards, KY**

"Amateur radio is changing from a high tech hobby of the 50's to a personal communications hobby of the 90's. **...Jim/WB9CEP, Indianpolis, IN**

"I do not enjoy CW but I spent the time (a lot of time) and effort to get the Extra Class. The code did not come easy for me but at age 57 I passed my Extra requirements. Now someone proposes lowering standards and giving Advanced Class the same benefits of Extra without any effort at all. Two wrongs do not make a right. The error of 1967 will become the error of 1992. I feel that