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December 23, 1997

To: FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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From: George Uebele, WW7E

Re: Petition for Rule Making #RM-9196

I have reviewed the above petition presented to the Commission from The American Radio Relay League, Incorporated. I have some comments in regards to the matter addressed in the petition, but first I feel that I should give some background in my involvement with Amateur Radio.

I received my first Amateur Radio license, W6AQG, when I was a teenager in 1947. In those days there were only two classes of license, A or B. One had to go to a FCC office to first pass the receiving and sending code test at 13 words per minute. One had to have a full minute of exact copy of five random letter groups sent at 13 words per minute. Then the candidate had to demonstrate a capability of sending code (I passed the code tests the first time I took them). Then, and only then, could one take the written exams, one for a class B and one for a class A license.

During the years I let my license expire, and in 1987 when I retired at age 57 I got the "bug" to become a ham again. I had to start at square zero, but there were more steps now -- 5 words per minute, 13 words per minute, and 20 words per minute code along with written exams for Novice, Technician, General, Advanced, and Extra class licenses. Quite a bit different. I felt that it would be easy to again handle 13 words per minute code. The five words per minute was easy. However, the 13 words per minute took many practice sessions each day, and after failing my first two exam sessions, I passed the code on the third try. This took nearly a year of daily extensive work on the code. I earned my Extra license the end of 1988 and received my license in January of '89.

The local ARRL VE exam team requested my getting a VE accreditation. I started giving exams early in 1989. In 1994 I became liaison for the local VE team. This VE team gives six scheduled exams each year plus special exams for radio classes, etc. I have not missed a session since I have started.

Our team has seen very little use of the physicians exemption. Unfortunately, I feel that none of the exemptions we have processed were truly handicapped. Some were friends of mine that I believe that with a little work they could have eventually passed the code test, just as I had. All were senior citizens, as I am also. I realize from my own experience that it is considerably harder to gain the code expertise at an older age than compared to a teenager! I realize that it becomes very discouraging to feel that you are making headway on the code

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speed, but does it mean that the medical exemption is the answer? I think not. It just takes more tenacity when you are older.

I have seen persons who come in with a "hearing handicap" for hearing the code but have no problem hearing me, and I am known for my very soft voice. One person with the exemption said that he could not distinguish between the dots and dashes, and yet the same person was expert in distinguishing faults with other ham's audio, a touch of hum, etc.

I think that the physician's code exemption has been abused and must agree with the comments of ARRL in this petition to the extent of the problem. It is time to correct the problem, and I welcome the corrective actions suggested by ARRL. I do have a little uneasiness with the encouragement of non-standard code exams. So far our team has not had to perform one of these special exams. We came close this last year with one candidate asking about a sending test. This simple request made us realize that it would present problems for us feel comfortable giving the exam and accrediting that the person was really sending accurate copy at 13 words per minute. It would be a test of the examiners rather than the candidate. The examiners have already passed their code tests. Why should they be subject to doing it again from a questionable code source.

The other allowable variations of the code test present problems of the team being qualified to feel comfortable that the test would truly demonstrate the candidate had passed the modified test requirements. I would like to see accredited VE teams that are specialists in giving these special code tests with both the proper equipment and proper training to evaluate that the results of the test meet those requirements for code comprehension that the FCC wants to show for code competency.

I wonder at times if it would be better to eliminate all code tests over five words per minute. The military has stopped using CW code for example. I am not against hams using code. I feel it is still a very valuable means of communication , but we do not require testing of other means of communication such as AMTOR, Packet, etc. in Amateur Radio. Why should we be so intent on the CW code aspect in our tests.

I thank you for considering my input to the petition RM-9196.

73,

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cc: ARRL
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