

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the Record 1 of 1

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of) WT Docket No. 98-143
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1998 Biennial Regulatory Review --)
Amendment of Part 97 of the Commission's)
Amateur Service Rules.)
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To: The Secretary,
Federal Communications Commission

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1. I am a licensed Amateur Radio Operator, K5IDX, and hold an Advanced Class License that I have held for 27 years. I have been a member of the Amateur Auxiliary as both an Official Observer and Official Observer Coordinator for the North Texas Section of the ARRL. I also have held a General (Commercial) Radiotelephone for the past 28 years. I am an Electronics Engineer employed in the Electronics Communications Industry.

2. Morse Code Requirements

I agree with the FCC's statement that non-hobby use of Morse code has declined in the past few years. Like many modes of transportation (such as the horse and buggy), Morse code has had its time and served us well, but now new modern modes have taken its place. Morse code's current use in amateur radio testing procedure is being used as a purely a filter, partly because of tradition, and partly because of an unwarranted fear of opening the amateur ranks to the masses. A potential licensee who has trouble learning the code has to be very determined and work extremely hard to achieve the goal of passing the code test, for which he may never use again.

This question should be considered when considering to continue Morse code testing or not; Does learning Morse code bring any more technical expertise into the hobby? My answer to that question is no, it doesn't. The Amateur test could be made even more difficult than it is now, especially in the higher classes of licenses.

The only reason that we should retain Morse code is to satisfy an international agreement. My recommendation to the FCC is to drop the code requirement as a filter in climbing the class ladder. If the commission feels it must, to satisfy our international agreement, make the requirement for all classes above Technician be five (5) words per minute. Although I think this would again be revisited after the ITU conference in 2001.

A bold (and modern) move would be to discontinue code testing altogether.

3. License Structure

If the requirement for Morse code were either eliminated or drop to 5 or 13 words per minute, the license structure could be simplified even more than that the commission staff has proposed. By removing the 20 wpm barrier, I believe that the Amateur Advanced class would migrate to the top class (Extra), making the Advanced class unnecessary. Calling the Technician class, the entry class of license is not quite accurate. As Technician class licensees have full privileges on the majority of the amateur radio spectrum. I believe that the commission should take this opportunity to completely overhaul the licensing structure and put classes of license in order of technical expertise, not frequency spectrum, knowledge of Morse code etc.

My recommendations are as follows:

Reduce the number of classes to three: **Communicator, General, Extra.**

- The **Communicator** Class license would retain some privileges of the current Technician class, but would add some privileges not currently authorized. this class of license would have privileges on the 2 Meter , 1 ¼ Meter, and 70 cm bands, could not be a control operator of repeaters or other automated systems. Testing for this class would consist of 40 questions encompassing regulations, safety, elementary electronics, etc.
- The **General Class** would retain all of the privileges of the current General class. Current Technician plus licensees would be grandfathered to this class. The test for this class of license would consist of 50 questions on rules, electronic theory, safety, etc. New applicants for this class of license would have to hold a lower class of license for a period of 6 months.
- The **Extra Class** of license would be incorporated for the current advanced and Extra class of licensees. Applicants for this class of license would be required to pass a test consisting of 100 questions on advanced electronics, communication theory, regulations, etc. New applicants for this class of license would have to have held a lower class of license for two years. As this class of licensees is the "top" license, the licensee in this class should be considered experts, but the current system does not provide for an experience level, only memorization ability. The current system produces "instant experts". Individuals who have had no prior experience in amateur radio after passing the extra class test are given all privileges. and are indistinguishable from an amateur with many years of experience and knowledge.
- Current **Novice** licenses would be continued (along with current privileges) if renewed, but no new applications would be accepted for this class.

4. **Privatization of Certain Enforcement Procedures**

It would be prudent for the commission to utilize the Amateur Auxiliary to better enforce the regulations of the commission. My recommendations are as follows:

- Create a Amateur Auxiliary Liaison Officer with FCC field office to work with the Official Observer Coordinator(s) in that district and with the Amateur Auxiliary office with the ARRL.
- Allow the Amateur Auxiliary to draft an order to show cause to initiate a revocation or cease and desist hearing proceeding. Set up a review board consisting of ARRL officials, FCC officials, and Amateur Auxiliary volunteers to review cases.
- Make examples out of several offenders in each district with much publicity in the Amateur media.

5. **Summary**

- Eliminate Morse code as a testing requirement (or at least drop to 5 wpm).
- Reduce number of class of licenses to three. Communicator, General, Extra
- Add requirements to General (6 months) and Extra (two years) for time in grade.
- Allow Amateur Auxiliary to prepare paperwork for filling on rules enforcement.

By applying the above ideas to the regulations governing amateur radio, it would accomplish the aims of the Biennial Regulatory Review in simplifying those regulations, and provide the amateur service with more technically qualified personnel.

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