

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

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Morse code I have found over my 41 years as a amateur radio operator has enabled me to meet on even ground foreign amateur radio operators who otherwise I would not have been able to converse with in voice because of their lack of english speaking ability.

Any change in code speeds below 13 WPM would not be consistent with the speeds of existing conversations on the amateur bands as the average speeds are between 15 and 20 WPM. When a person studies for the 13 WPM entry level to the General class license which will be retained in all existing restructuring proposals, that applicant will improve his or her speed naturally.

The 13 WPM requirement is not too far fetched and should be retained in passing the General Class license.

In my 5 years as a volunteer examiner in charge of a VE team, I found that the 20 WPM requirement was just a little too tough for the average applicant and that 18 WPM was a more appropriate speed. I recommend a 18 WPM code speed for the Extra Class license. This would bring within reach the highest class of license available to those attempting the morse code barrier which in itself is a self pride skill bringing satisfaction and a sense of achievement that is enjoyed when conversing with other Extra Class in that portion of the Extra Class bands.

Morse code is a moral booster rather than a deterrent in passing a test. I have seen the excitement and pleasure in the passing of a morse code test and I can attest to the fact that it is a plateau reached that is most pleasurable for those passing so please do not take that moment away from them.

In the matter of how the morse code test is done, I find that the multiple choice or fill in the blank is a wasted part of the test as those who really do not know the code will fail both. So I propose that the one minute solid copy be reinstated in all morse code testing.

In the matter of Novice license, I agree that the Commission should drop that license and let the existing Novice license holders use any portion of the CW bands with their 200 watt limitation.

In the matter of allowing Advanced Class VE to test General Class I find that the VE team has to have at least three Extra Class at the test session and this is more of a problem than not. Allowing the Advanced Class to test the General Class in itself is not going to make the load any lighter as far as us VE are concerned, we need to have more Extra Class volunteers, this is the major problem in being able to conduct a test for we do not know how many will take the Extra Class test when we have walk in accommodations.

In conclusion, I would ask the Commission to replace the morse code requirements being dropped with equal technical written elements. To retain the 13 WPM General Class requirement and change the Extra Class morse code requirement from 20 WPM to 18 WPM.

Respectfully Submitted
Howard P. Gould W4NVF