

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

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In response to the Commissions request to give them input regarding proposed changes to the amateur radio licensing in order to streamline and simplify the present system I offer the following.

In regards to the Novice license first the Commission states that this license was mainly used for telegraphy but fails to recognize this was an entry level license which helped me enter the hobby back in 1957 and I had to understand the fundamental ohms law and other criteria so I could transmit on certain frequencies.

Telegraphy was a way of communicating and still is today but the Novice license then was valid for one year and I had to upgrade or my right to remain an amateur radio operator would cease.

The Commission made a mistake way back then to eliminate the one year requirement on entry level Novice and into the no code Technician license and has created unnecessary paperwork for themselves because of the small percentage of renewals in the ten year time period of present day licensing.

Yes, there is a lot of activity in the no code licensing but, the genuine interest in amateur radio that attracted myself and others to the hobby is not the same because of the latest technology in the manufacturing of equipment for use on the amateur radio bands. Back in the fifties, sixties, and seventies, lots of building and experimentation took place by amateur radio operators. We maintained our equipment and saw to it that it was aligned properly and was in top notch shape. We had FCC monitoring then and rules and regulations that we respected. Very little building of radio devices takes place today because of the high tech manufactured devices available and total lack of interest in building your own.

The Commission makes statements about attracting technically inclined electronics and communications experts in their reasoning behind the no code Technician license when in reality most of the licensing taking place is not to experts at all but to persons who the majority of have memorized the answers from the question pool and do not know a thing about radio. I back this statement up with my experience as a VE for the past 5 years. I have conducted many tests including hamfests where large numbers have passed through and I have seen the same persons many times over come back again and again until they finally pass. If the Commission had made the entry level license a one year non renewable we would have today only those persons who had a genuine interest in amateur radio upgrading from the no code ranks.

If the Commission drops the Novice license and has the Technician as an entry level license, the Commission should seriously consider a one or two year non renewable type license so as to weed out those persons who do not have a genuine interest in the hobby.

The Commission should also consider the present system of written examinations having a serious loop hole in that the answers are part of the published material available and by having them so, many, many of the applicants are memorizing the answers in order to pass.

I believe the Commission has gone too far in simplifying the amateur radio licensing structure and has made it too easy and is not

attracting the original persons outlined in this NPRM. Unless changes are made to protect the integrity of the exams, there will be large numbers of persons coming into the hobby that do not know anything about radio and who are just here to try it out and will be just on the data base for a ten year period making the numbers look good.

Respectfully Submitted

Howard P.Gould, W4NVF