

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

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Proceeding Name: 98-143

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Submission Type: CO

Submission Status: ACCEPTED

Viewing Status: UNRESTRICTED

Subject:

DA Number:

Exparte Late Filed:

File Number:

Calendar Date Filed: 08/17/1998 11:35:40 PM

Date Disseminated:

Filed From: INTERNET

Official Date Filed: 08/17/1998

Date Released/Denied:

Initials:

Confirmation # 1998817776741

Date Filed:

DOCKET FILE COPY ORIGINAL

INTERNET FILING

98-143

8/17/98

From: howiew4nvf
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To: bvarone@juno.com
Subject: My last
X-Status: New

Federal Communications Commission
Docket Number 98-143

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Regarding Novice license removal, Technician Plus removal and morse code.

I agree with the Commission that there is much overlap between the Novice, Technician and Technician Plus licenses and that the Novice license be removed.

In the matter of what to do about the existing Novice frequencies, I believe that these frequencies should be opened up for normal use by licensed amateurs holding HF privileges and the 200 watt limitation be removed on these frequencies. The existing Novice and Tech Plus licensees should be allowed to use the 80, 40, 15 and 10 meter bands for morse code use with a 200 watt limitation.

Since the 5 WPM element 1A would no longer be required any credit for existing Novice and Technician Plus licenses would be mute unless the Commission was thinking of changing the element 1B now required for HF entry of 13 WPM to 5 WPM.

This speed is too low and I would oppose any change to the 1B requirement for HF entry level. My reasoning is based on 5 plus years of testing applicants for morse code passage on elements 1A, 1B and 1C. Being certified as a VE and testing morse code applicants with my own VE team plus many hamfests for other VE teams, I found that with the over 500 applicants tested a very small percentage failed the 1B when put to the test. The reason for this was because the applicants had already learned the 5 WPM and had simply increased their speed naturally as most amateurs do.

The entry level 1A was a little more harder for those Technicians upgrading to Technician Plus because of their lack of understanding the morse code and most certainly would be a hindrance to most of the existing Technician licensees if indeed the Commission lowered the HF entry level speed to 5 WPM. We would have the same amount of pass failure rate that we do now in the 5 WPM initial tries.

The majority of Technician licensees that I have had personal contact with want HF privileges but with no code requirement. It seems to me that in order for us to motivate this huge bunch of Technicians to upgrade is to give them an incentive. Since we are dropping the Novice class, why can't we provide an entry level HF band license for limited HF frequencies similar to the Novice frequencies with limited power where we the at large amateurs who are experienced can monitor their progress and make contacts with them. The code requirement would be 5 WPM and we can keep the element 1A.

Since those who pass the 5 WPM test are naturally going to increase their speed, there would be a better than average upgrading to a full HF license after passing the 13 WPM test which as I mentioned from my experience would be no major problem for those already reaching HF privileges through the 5 WPM entry level. Since the HF Technicians could have morse code privileges on any portion

of the 80, 40, 15, and 10 meter bands, their speed will increase naturally making contacts with many amateurs.

I did mention that I would oppose removing the 13 WPM HF requirement but I would be agreeable to a limited HF Technician Plus license and retaining that class and grandfathering existing Technician Plus into the limited HF privilege band. The existing Novice class could upgrade easily with the 3A written element since they would receive a credit for the 5 WPM which now makes more sense in upgrading.

My reasoning behind this is that at one time we had a 1 year Novice license which in itself was very good for the hobby and it forced those who were very interested in the hobby to upgrade. The way to more privileges should be done in small increments for those still learning about radio so as not to discourage them. If the Commission gives too much at one time, it defeats the purpose of incentive licensing.

I have no particular choice of frequencies for the new proposed limited HF Tech Plus license but expansion of the existing Novice CW to phone for the limited HF privileges on at least the 40 meter band using the 7100 to 7150 for phone with 200 watt or less restriction. They would get a taste of working the world and would more than not upgrade quicker wanting more HF to work.

The morse code element 1C for passing the Extra Class needs to be trimmed down to 18 WPM according to my experience.

My reasoning is this. Of all the morse code exams taken this is by far the hardest for all applicants to pass. Only exceptional applicants can pass this for it is a speed that causes problems in writing for most applicants. Even amateurs who have been licensed for years have a problem with this speed. I have conducted tests with the 18 WPM speed and have found that this speed is more forgiving in the code classes that I have conducted.

In conclusion, my proposals would remove the Novice license, retain the Tech Plus license by giving additional HF phone privileges for the 5 WPM passing and enable existing Novice to upgrade to more Phone HF privileges with passing of the written element 3A. Retain the 5 and 13 WPM elements 1A and 1B and reduce 1C requirements to 18 WPM.

Respectfully Submitted

Howard P. Gould, W4NVF