

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the  Record 1 of 2

Applicant Name: John R. Moore

Proceeding Name: 98-143 Author Name:

Lawfirm Name:

Contact Name: applicant\_name

Contact Email: w4ue@pobox.com

Address Line 1: P.O. Box 728

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City: Booneville

State: AR

Zip Code: 72927 Postal Code:

Submission Type: CO  Submission Status: ACCEPTED  Viewing Status: UNRESTRICTED

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98-143  
8/18/98

I apologize for sending the wrong file on my previous posting, please accept this for my comments on 98-143.

My comments on 98-143 follow.

Par 11 comment:

The current 6 classes of amateur licenses are not required. Amateur radio would be better served by reducing the license classes to 3, Technician, General, Extra. Current novice and Technician plus licensees would be incorporated into the General licenses class after passing the written examination for the general class license. General and advance would be incorporated into the extra class License after passing the written examination for extra.

par 12 comment:

The novice frequencies could be best utilized by eliminating them and splitting them up both to SSB and CW

Par 13 comment:

Technician Plus operators spend most of their time operating on 10m SSB, and other bands on CW. They do operate on VHF etc., but it is not the majority of their operating. The combining of the Tech and the Tech/Plus into one data base will create an even more confusing and difficult uncontrollable situation in trying to enforce the rules governing operator privileges. This happened when the no-code licence was first introduced. A better solution would be as the ARRL proposal suggested, is to merge the Tech/Plus with the General class operators. There is very little difference in their requirements. The main one being CW speed. Many Tech/Plus operators have passed the exact elements as the General, except the code speed.

Par 14 comment:

Amateurs licenses should be allowed to administer any exam for any class that is a lower level than their own after the proper VE questions are put into the all test elements.

Par 16 comment:

The RACES license is redundant and not needed.

Par 18 comment:

More enforcement is needed, however it must be tempered with the rulings of the courts today. The only way to accomplish this is to have an Amateur Auxiliary that is properly trained in enforcement procedures. The only way to accomplish this is for the FCC to provide strict guide lines and for the administering body to have a very strict training policy. And for the administering body to strictly oversee the actions of each and every member of the Auxiliary and to have the

authority to immediately terminate a member of the Auxiliary who does not comply exactly with the strict guide lines. No room should be left for an individual to interpret a guideline.

Par 23 comment:

The different code speeds are not really relevant to good or proper operating procedure that many proclaim. There are bad operating practices at all levels as it is the person and their character that determines how they behave.

Par 24

The three level system of Code requirement is no longer relevant to Amateur Radio. However, I do feel that Code is relevant to the skill levels of operators. I think that Amateur radio would be much better served with a beginners and shall we say expert Code requirement. The beginners speed being 5 WPM and the Expert being 13 WPM, and all the code examinations be administered requiring you to copy at least 1 minute solid copy.

Par 25

While valid in a few cases, the medical disability claim for the code requirement is abused by many to get around the higher code speed test. How many people use this deception by having a friendly MD write a note is difficult to determine and would invade the privacy of many. The only answer is to allow it or disallow any exception which would not be fair to the truly handicapped. A possible solution to the abuses would be to add a section to the Form 610 that would allow the applicant to sign a statement allowing the physician to accurately describe the disability that makes it impossible to learn and copy code. And on the FCC form 610 require the Physician to accurately describe the disability that makes it impossible for the person to learn and to copy code.

Par 26 and 27

VE Goups should be allowed to change the questions technical content for relevancy BUT, this should ONLY be done every 4 or 5 years and done through ARRL oversight for nationwide consistency to avoid variances in testing difficulty from area to area.

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Volunteers Examiner Coordinators (VECs) representing nearly all of the U.S. Amateur Radio Operator license examinations administered in the United States met with the FCC on July 9-10 at their annual Conference held in Gettysburg, PA.

A VEC organization coordinates the administration, processing and electronic filing of Amateur Radio license applications. A VEC acts as the link between the VEs (volunteer examiners) who administer the examinations and the FCC who issues the Amateur license. There are 15 VEC organizations and approximately 35,000 accredited VEs. More than a million persons have been administered Amateur Radio examinations under the VEC System since its start in 1984.

The three "hot topics" at this year's conference were:

- (a) the decline in Amateur Radio interest and licensing,
- (b) the FCC's new Universal Licensing System which is now in development. ULS will replace 11 different licensing systems with a single database and reduce the number of wireless radio application forms from 40 to only 5. Future applicants for U.S. Amateur Service licenses will use a new multi-purpose FCC Form 605 and a supplemental Schedule C. Implementation is expected in the Spring of 1999.
- (c) Ms. D'wana Terry, Chief of the Wireless Division confirmed that the FCC would be adopting a Notice of Proposed Rulemaking (NPRM) which looks toward streamlining and eliminating unnecessary rules in the Amateur Service. Ms. Terry said she was limited in what she could say because the FCC Commissioners are still working on the Rulemaking. The NPRM will apparently address more efficient licensing, a reduction in the number of license classes and a de-emphasis on Morse code examinations. The rumors are that the present six class licensing system could be reduced to three and code testing cut back to the minimum required under international law for all classes. Ms. Terry said the Rulemaking would include both discussion topics and specific proposals. She acknowledged that one of the things the FCC was looking at was a reduction in the Morse code exam speed as a way around the sometimes unpopular and abused 13 and 20 words-per-minute code exam waivers. No date has been set for the release of the NPRM but it could come as early as a month from now.

(4.) The NCI Board of Directors agreed to support a 5 words-per-minute code speed for all license classes as an interim measure until the international Morse code proficiency requirement for HF Amateur operation could be totally abolished. The Amateur Service regulations are on the agenda for the World Radio Conference to be held in 2001.