

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the Record 1 of 1
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FEDERAL COMMUNICATIONS COMMISSION
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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of) WT Docket No. 98-143
)
1998 Biennial Regulatory Review --) RM-9148
Amendment of Part 97 of the Commission's) RM-9150
Amateur Service Rules.) RM-9196
)
)

Comments

I write this in concern of some of the proposed rule making that you are suggesting. I will outline each point below:

FCC Proposal: Reducing the number of licenses by eliminating the NOVICE and

TECHNICIAN PLUS.

My Comment: Reducing the number licenses is a good idea, however, not at the

expense of the two licenses. As stated in a letter you received from

the ARRL, NOVICE license holders should be allowed to take the written test of element 3(A) and 3(B) within one year after the

rules

are changed and given GENERAL operator priviledges. As for the TECHNICIAN PLUS license, they should be allowed to take the element 3(B) test and upgrade to the GENERAL license in the same time frame.

My Reason: Giving a specific license holder GENERAL priviledges because they

received their license before a specific date (IE: March 21, 1987)

because of the test element (3B) is unfair. If this is allowed, many

amateurs would no longer find interest as they would be required to

give up their license because of the stringent requirements to upgrade.

Both of these license holders have experience in the HF band. Not giving them the chance to upgrade would cause disappointment.

It would be a disservice if these TECHNICIAN PLUS licenses are allowed to upgrade just because they have taken element 3(B).

Performing these license upgrades allows those licences to leave the FCC database through attrition, removing the need to keep

such

license in the database and reducing paperwork. If they don't upgrade

their licence within a year, both license would become TECHNICIAN.

FCC Proposal: Greater volunteer examiner opportunities.

My Comment: I find this proposal fair.

FCC Proposal: RACES Station license.

My Comment: I find this proposal fair.

FCC Proposal: Privatization of Certain Enforcement Procedures

My Comment: Enforcement of compliance is in need of volunteers. Providing some

any type of training in handling and monitoring of the bands for enforcement would allow volunteers to be able properly handled
at least infraction of the bands. Volunteers need to have a license for
required. 10 years and a GENERAL class license or higher would be
provide Volunteers must log about 50 hrs of monitoring. This would
a simple and easy solution that would keep the FCC's costs down.

FCC Proposal: Telegraphy Examination Requirements

My Comment: Use of morse code is still useful in low power situations. However,

needed. the need to keep morse code as a test requirement is not fully
operator, Since data communication can send data faster than a CW
testing morse code becomes just another mode. Though some type of
how is need to comply with international regulation, the speed of
just it's received needs to be reduced. I believe the 5-10-15 WPM
code approach is adequate with this requirement. I also believe that
because receiving the code is adequate for testing purposes. Sending the
during testing would just add to another item to be waived
of physical handicap.

My Reason: Technical knowledge is needed in this forum, not a skill. The only

regulations. If reason I support this MODE, is because of internation
of that regulation is removed, then I would support complete removal
more the code requirement. This forum should be working on getting
through technically inclined people, rather than filtering out people

requirements use of a mechanical SKILL. Since we don't test for other MODES,
why make this hard. Older operators with GENERAL or higher
class of license are more against any changes to the requirement.
I believe that the need to improve the written testing

are needed rather than keep testing a MODE that is outdated. Most
licenses are using computers to send code rather than having them
sit and pound on a hand keyer. So why do we keep this

requirement?

The higher class license always say to me, 'I did it and so
should you'.

should But those same people can't get their computers to run right. So

we test them on Computer Operations also, no. We need operators
who
can choose what they want to do. Let's not limit them because
they can't
perform a skill.

FCC Proposal: Examination Requirements

My Comment: To really test an individual on their knowledge of the rules and electronic theory, The testing pool should be used as a guideline on how the questions to be presented. Example: Have an Ohm's law question not set to a specific set of numbers, Have the question were the examiner can enter their own numbers into the problem and provide multiple choices for the answers with only one right answer. Another example, for a Regulation question, would be a question that required a person to know what section in Part 97 covers 'malicious interference'. Then they would have to pick the proper answer from a multiple choice answer. This answer wouldn't be to indepth, as it could be answered with 97.101. This would also allow flexibility in preparing the test as 97.101 covers other items like 'priority

to

emergencies' or 'non-exclusive use of a frequency'.

My Reason: This will reduce the problem of memorizing. Now people would have to understand Ohm's law. This will provide the vehicle to have people who are more interested in this forum. I've seen alot of memorizing of the questions just to get a license and talk on the radio with their friends. But when asked what is the current draw on their radio, they don't understand what current is. This is the problem with todays question pool.

In conclusion, I feel that no license operator should be downgraded in his priviledges.

NOVICE and TECHNICIAN PLUS should have the opportunity to take the required written tests and upgrade to GENERAL. Both license are familiar with the HF band and can be very useful in providing long range communications. We must also be a little less stringent on the code requirement as this is not a technical skill. We must provide a more challenging way to test people on their technical knowledge by removing the memorizing of the question pool and use the pool as a guideline.

Thank you for your time,
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