

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

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Amendment of Part 97 of the Commission's)
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NOTICE OF PROPOSED RULE MAKING

Adopted: July 29, 1998

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1 September 1989

Comments from
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1. I am in partial support of the ARRL Proposal to upgrade novices and technician plus licenses to general class privileges. I do object however to the automatic upgrade of those persons with technician plus licenses issued after March 21, 1987 and novice licenses to general without the proper examination credit for the general class license, element 3(B). Technician Class Amateurs grand fathered should automatically be upgraded. Changing licenses to A, B, C and D is a bad idea. Use the current names. This will avoid confusion over what class ticket do I have, not necessarily for the amateur himself but to local law enforcement and the like. Novice class tickets should be renewable. Technician Plus licenses issued after March 21, 1987 must take the written elements for upgrade to general.

2. I do, however, support the ARRL's proposal to reduce the requirement of the Class C or GENERAL class licensee to 5 wpm I do not support the 12 wpm for advanced and extra. 5 WPM is a good place to start on the air. It gives the amateur more room to open his horizons and especially if he wants to operate CW, digital and phone modes not authorized in the Novice segments.

a.. The ARRL has proposed a 5 WPM "General Class" license, which they call "Class C". I applaud the ARRL board for making this brave decision.

b. Elimination of the Morse code examination as a criterion for amateur licensing. I note that the ARRL has proposed a 12 WPM exam for the proposed "Class B" and "Class A" licenses. I feel that these licenses should also require only a 5 WPM exam, and I urge the commission to make that change to rules. This is not to say that I are opposed to the use of high-speed CW on the air. I simply think it is something that amateurs should do voluntarily, and it should not stand in the way of their becoming HF operators.

c. The sole remaining reason for Morse code examinations stems from a 50-year-old regulation now called "S25.5" in the International Telecommunications Union treaty which requires manual Morse proficiency to be demonstrated before a license can be issued for operation in amateur spectrum below 30 MHz. S25.5 should be struck from the treaty at the next ITU meeting. I urge the ARRL, the IARU and its member societies, and all ITU member nations and observers to work toward the elimination of S25.5 as soon as is practicable.

d. I SUPPORT THE No-Code International'S TM Position in this matter.

1. NCI is not opposed to manual Morse code operation. But CW is just another mode and should

not be afforded any special priority over others. It is available to those who wish to use it. Morse proficiency should not be required for those who do not wish to use the mode.

2. Manual radiotelegraphy communications has been superceded by more modern, reliable, accurate, faster and efficient means of communication.

3. Requiring manual telegraphy proficiency is not compatible with the radio amateur's mandated objective of contributing to the advancement of the radio art.

4. No evidence exists that Morse proficiency is an indicator of a desirable, motivated or better qualified operator.

5. The Morse code requirement serves as an advancement barrier to many otherwise qualified individuals.

6. The value of Morse code communications in the Amateur Service is primarily recreational in nature and manual telegraphy proficiency should no longer be a compulsory licensing requirement for any class of Amateur Radio license.

Many technicians enjoy the privileges of digital modes on VHF and above and would enjoy these mode below 30 Mhz. This proposal, however, does not grand father General Class licensees that were issued before 1974 when privileges earned were taken away in the name of incentive licensing. These lost privileges should be partially restored and licensees be upgraded to at minimum advanced class privileges to regain some lost privileges. No upgraded licenses should be issued until time for normal renewal (to save the commission from a mass of unnecessary license upgrades) and at that time copies of the ORIGINAL license obtained at that time of grand fathering must be submitted with the FCC Form 610 to obtain a renewed license with the proper upgraded privileges. Your license must not have been expired revoked or any other break in force during that time frame since the grand fathering date. New privileges can be used immediately upon adoption provided the licensee has in his possession documentation to prove grand fathering.

The Original license issued must be kept in station records for those licensees wishing to utilize

upgraded privileges, for technicians to general the original document issued before 12 March 1987 and for General to Advanced the license issued before 1974. No new privileges will be authorized without original documentation in station records. Unfortunately this precludes amateurs with poor record keeping but removes any doubt of eligibility since the commission may or may not have records predating 1974. Call book data and other methods should not be substituted for original licenses.

3. Novice bands should remain as a hold out for low power operation, limiting it to 200 watts PEP CW mode only for all class of licenses as is currently in the rules. Amateur Stations should be encouraged to run the minimum power required to make the desired communications as so not to get lost in the kilowatt syndrome where stations operate at full legal power all the time . It should be a haven for CW operators to go for pure CW operations without fighting with other digital modes for bandwidth and overpowered stations.

4. Conclusion

I am in favor of phasing out the technician plus and novice licenses and in favor of reducing the morse code requirements to 5 wpm for all licenses. Automatic upgrades are a bad idea for those technicians not grand fathered. And general class licensees issued licenses before incentive licensing in 1974 be upgraded to at least advanced class.

Paul Hintz