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SEP 4 1998

FCC MAIL ROOM

September 1, 1998

FCC Secretary
1919 "M" Street, N.W.
Washington, D.C. 20554

Re: Notice of Proposed Rulemaking #98-143

Dear Sir or Madam:

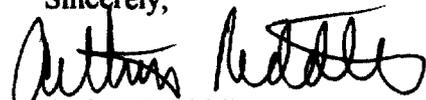
This is one of the Best Ruling the FCC has proposed for Ham Radio. I am a Technician Plus Class operator (KD6LPO). I have passed the General Class exam but not the 13 words per minute code test. I have taken it several times.

Due to the fact that I cannot upgrade, I lost interest in the hobby and have not purchased any HF gear. In addition, my girl friend has also lost interest due to the 13 wpm barrier. Many of my friends have the same feeling. NPRM# 98-143 will increase interest in the popularity of worldwide ham.

It appears that every country in the world is de-emphasizing Morse Code. Morse Code does have a place. Nevertheless, once I am on the HF Bands, I will be exposed to Morse Code and will increase my speed to upgrade.

These new proposed rules are very exciting. Keep up the good work.

Sincerely,


Arthur J. Riddle

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QUANTITY VERSUS QUALITY by Bill Welsh (W6DDB)

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The FCC's proposal detailed in WT docket 98-143 requests comments regarding their suggested changes. They say they are seeking ways to streamline and improve current amateur radio operator examinations.

The related ARRL proposal suggests four levels of licenses. It would significantly reduce code test requirements, increase operating privileges, and reduce code segments on the 15, 40, and 80 meter bands.

If you wish to submit comments in response to the FCC's notice of proposed rule making and/or the ARRL's related proposal, you can find both detailed in amateur radio publications.

Both proposals appear to argue that the quantity of American operators is more important than their quality. I believe this assumption is wrong and it could lead to the destruction of our Amateur Radio Service. I strongly believe we need amateurs with improved technical knowledge, more participation in public service events, and greater ability to participate in handling emergency communications. I believe we have too many people who hold amateur licenses but who seldom (if ever) operate.

Experience has shown that telephone service is commonly overloaded or disrupted during emergencies. Cell phones can be unreliable when they are needed. We have got to be prepared to help the public when minor and major emergencies occur.

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I have conducted amateur radio licensing courses about 50 years. It is easy to prepare students to pass FCC tests, but it is almost impossible to get them operating on the air. The existing questions and answers pool is poor. I believe the VEC groups need to make it easier for class instructors and license examiners to have corrections adopted. Questions involving crystal controlled oscillators, external standing wave ratio bridges, and similar outdated items should be eliminated or updated. Of more importance, Technician licensees are granted operating privileges using several modes which are not included in related examination material. Test coverage needs a lot of expansion.

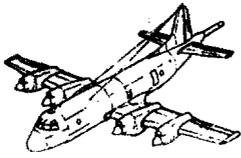
Eliminating the code test requirement is a step in the wrong direction. We can't get a license to drive a vehicle or to fly an aircraft without proving that we possess the necessary operating capability. The current system of using volunteer examiners should make it possible to conduct mode examinations. Instead of eliminating any code tests related to an examination, actual operating tests should be required of each applicant seeking operating privileges for any mode. Simply stated, we need mode licensing in our Amateur Radio Service. This radical change should help get new amateurs started on the air. I have submitted my mode licensing proposal in the past. A copy of it is available to anyone who requests it and furnishes a 10 by 12 inch self-addressed envelope with double first class postage attached.

It is vitally important to make certain amateur radio receives public recognition of any service performed. Amateurs seem to be very poor communicators in regard to advertising what it does

for others. We need all the good publicity we can get. It is not very helpful to simply get coverage in amateur radio publications, since the general public is unlikely to see such items.

The existing international requirement for code capability for those who seek authority to operate on high frequencies is still in effect. It requires such applicants to have the ability to receive the International Morse Code by ear and to send it by hand. The sending test has not been adhered to over many years. I was told that this requirement was initiated to make sure operators would be able to copy any emergency message they hear. Obviously, that need is quickly disappearing as the use of code declines. Code remains highly effective as a means of communication, and that fact has not changed.

We do not need a bunch of less qualified amateurs, we need highly qualified operators. Quantity is a sad substitute for quality. I prefer to be proud of our Amateur Radio Service.



from the desk of

Wm. G. Welsh

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MODE LICENSING IS LONG OVERDUE.

VOLUNTEER EXAMINERS HAVE THE
VARIOUS OPERATING MODE EXPERIENCE
THAT IS NEEDED TO CONDUCT INDIVIDUAL

MODE TESTS.

73 - Bill / W6DDB



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