

Sept. 11, 1998

Dear FCC,

In the matter of 1998 biennial Regulatory Review--Amendment of Part 97 of the Commission's Amateur Service Rules, FCC WT Docket 98-143. It is my opinion that the requirements for General Class licensees should be reduced from 13 wpm Morse Code to 5 wpm. This reduction should take place with an increase in the question pool in regards to operating practices. I am of the opinion that morse code is not pertinent to voice operations on the HF bands, however I do believe that General Class operators should be somewhat familiar with it and the 5 wpm requirement would satisfy this requirement.

I would also like to further comment on other proposals that have been made to the commission. I think that the question pool for NO CODE TECH licensees should be increased as so far as questions pertaining to operating practices. I have heard several operators that didn't seem to have a good grasp on good operating procedures, this however also should apply to the other license classes as well. This would increase the quality of the overall operating environment and promote on air courtesy.

I would also like to see a multiple choice code test be administered, this would enable applicants who don't have perfect copy but adequately understand the copy to pass their exam and continue to improve their code through practice "on the air".

Respectfully Submitted,

Charles P. Whipp

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Paul S. Towne, N1ZYB
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Sept. 14, 1998

FCC SECRETARY
Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
1919 "M" Street NW, Room 222
Washington, DC 20554

To Whom it May Concern:

In the matter of 1998 Biennial Regulatory Review--Amendment of Part 97 of the Commission's Amateur Service Rules, WT Docket 98-143.

I would like to have the FCC adopt the ARRL Licensing Restructuring proposal with the exception of the 12 word per minute code test. I would like to see the proposed 12 WPM Code Test changed to 10 WPM.

Basically, I feel that CW is important to preserve bandwidth and should be a requirement but at speeds in excess of 10 WPM it becomes an artform and therefore should not be required as part of a technical hobby.

Yours truly,



Paul S. Towne
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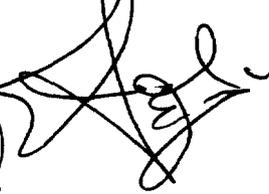
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I am a junior high/ high school teacher . I hope to use code in my classroom. By changing the requirements for General to 5 words per minute it is my belief that I will be able to interest more students in the world of Morse Code.

Yours truly,

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Linda L. Towne, N1ZYC
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Yours truly,



Linda L. Towne
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