

Comments on WT Docket No. 98-143

First, I would like to say that I am happy in seeing that the FCC and the ARRL are seeking ways to simplify the structure of the Amateur Radio Service. Also to thank the FCC for their efforts in getting this proposal out in a timely fashion, so it would benefit the public's interest.

I believe that if this restructuring is done correctly, it would help to streamline and bring the Amateur Service more in line with what other countries are doing.

Since there has been a general reduction in the usage of morse code in the world, and other types of digital modes have replaced morse code; it would benefit all to reduce that same need in the Amateur Service. Also, this would allow more time in other areas of testing in the Amateur Service.

Another would be the elimination of theory that is not really relevant to the Amateur Service, but in reality, is not really utilized like it may have been years ago. This has to do with some parts of the examination for the Extra class license, which in most parts parallels that for a commercial radio license. Remember, this is a hobby and not a commercial endeavor.

#### A) LICENSE CLASSES

##### NOVICE:

I support the stand to eliminate the novice level of license, as it isn't needed anymore. Also, those that do have a novice level license should be placed in the new General license due to their having morse code privileges already.

##### TECHNICIAN:

I support the stand to leave this level of license alone, and treat it as the entry level of license into the Amateur Service.

##### TECHNICIAN PLUS:

I totally disagree with the proposal when it says that it will downgrade the current Tech Plus licensees to Technicians. This very act would strip them of their HF Morse privileges, of which they worked so hard to get and enjoy. This act would also remind us of approximately 35 years ago, when they had "incentive licensing" and that did take privileges away from some of the license classes.

I would propose that in order to keep a separation from those that do have morse privileges, from those that do not have the morse privileges, would be to automatically upgrade all Tech Plus licensees to General Class.

##### GENERAL:

I support the idea of leaving the level of the General level of license as it is at this time. I also support the inclusion of the Novice and the Tech-Plus into the General level due to their already having morse

code privileges, for those frequencies below 30 Mhz.

Also, if there are any questions as to including the Novice licenses into the General Level, just look at the number of Novice license holders, and also the number of people applying for that license, and you would agree that, that the number of holders as well as applicants would not be that great.

ADVANCED:

Since this an amateur service only, I do not believe that some of the requirements that are needed to become an Extra Class licensee fall in the area as an amateur licensee. These smack more of an engineer level in the Commerical operator's license. I would propose that Advance Class and Extra Class licensees would be in one level of license, with some of the theory differences between the advance level and extra level being certain specialities, within that class.

LICENSING LEVEL BREAKDOWN:

CLASS	ASSIMILATES	CODE TEST
3	Technician	No Code
2	Novice, Tech-Plus, General	5
1	Advance, Extra	12

B) VOLUNTEER EXAMINERS

I fully support that a VE should be permitted to conduct an examination for the same or lower class license that he/she holds.

C) RACES STATION LICENSES

I agree that the RACES station license serves no useful purpose and should be eliminated all together.

D) ENFORCEMENT PROCEDURES

Since the FCC has reduced the number of Monitoring stations, down to what appears to be a centralized system, there has been a growing problem of unanswered complaints in the amateur bands. Also, since there has been a continued growth in the number of amateurs on the air, there also has been an increase in the amount of complaints, especially in those that have not been answered. It appears that with the down-sizing of the agency, that there is a need for some kind of manpower that would be dedicated enough to monitor and if need be, to enforcement of the amateur frequencies.

I feel that there could be a dedicated group of people that could be of service in this matter. I do not have all the information on the Amateur Auxilliary, but do believe that if this group was utilized more in the monitoring/enforcement area; this would solve those problems that do exist on the amateur bands.

E) TELEGRAPHY EXAMINATION REQUIREMENTS

I propose the following speeds of 5 WPM ( for General), and 12 WPM

(for Advance).

Also see above, for previous statements pertaining to morse code privileges.

F) WRITTEN EXAMINATIONS

The only changes that I could see that would have to made would be in the examination for the 4th level of license, of which would be for the combined advance and extra licensees. By removing those theory questions that reflect to commerical radio theory, you can then have an examination that is meant more to the amateur radio service, and not commercial radio. Remember this is an amateur service!

Respectively submitted  
on this 28th day of  
September 1998

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