

I have long believed that the requirement for high speed Morse code proficiency for amateur radio operators is obsolete. I applaud and support the ARRL's proposal for restructuring the amateur radio licensing system to de-emphasize Morse code proficiency and increase emphasis on modern communications technology and technological competence for amateur radio licensure.

I have read the Commission's rather lengthy proposed rule, and it appears to me that it deviates from the ARRL recommendation by preserving the high speed code requirements for General and Advanced Class licenses. If this impression is correct, I urge the Commission to revise its proposal to coincide with the ARRL recommendations. Specifically, the entry level (Class D) license should have no Morse code requirement and privileges of the current Technician (no-code) license. Current Novice, Technician Plus and General licensees should be grand fathered to a "Class C" license which would require a 5 WPM Morse code exam and the theory elements of the current General class license. The "Class B" license would be nearly the same as the current Advanced class license and "Class A" would be the same as the current Extra Class license.

Frankly, I think that even the ARRL proposal does not go far enough to de-emphasize the code requirement. I favor a no-code entry level license and reducing the code requirement for ALL other grades to basic proficiency at 5 WPM. The written technical exams should be revised to reflect current communications technology and increase in level of difficulty for each license class. Technical competence should replace Morse code proficiency as the primary requirement for an amateur radio license.

I also strongly support the ARRL's recommendation that the existing CW-only amateur bands be reduced and the spectrum reassigned to radio telephone and advanced mode communications. Indeed, I believe the Commission should go farther. The time has come to quit reserving special slices of the amateur radio spectrum for CW only. It just does not make sense to have radiotelephone, digital and advanced communications users lumped together in a "phone" band while the best part of the band is reserved for CW only. All communications modes allowed on a particular band should be allowed on the entire band. CW operators should no longer receive any special consideration.

Harold A. Helms, M.D., Ph.D., Comprehensive Ophthalmology
1100 South 23rd Street, Birmingham, AL 35205-2410
Phone: 205-933-2020
E-mail: hhelms@mindspring.com