

In the matter of 1998 Biennial Regulatory Review, Amendment of Part 97 of the Commission's Amateur Service Rules

A. INTRODUCTION

1. My name is Michael Borowiec, and I am an Advanced Class licensee in the Amateur Radio Service, callsign N9EUZ. I am also a member of the American Radio Relay League (A.R.R.L.). Herein, please find my comments on several issues raised in WT Docket No. 98-143.

B. REGARDING THE PROPOSAL TO ELIMINATE NOVICE AND TECHNICIAN PLUS

1. According to the Commission's data, as of December 1, 1997, there were a total of 227,524 Novice and Technician Plus licensees. This represents 31% of the total Amateur population - at that time, nearly a third of all licensees - a significant number.

2. With the possible exception of the "no-code Technician", no license class stands alone. Rather, each class is an intrinsic part of a structured hierarchy - a plan designed to define levels of proficiency in the Amateur service, and to act as a "roadmap" to increasing technical knowledge and operating experiences. As such, individual classes cannot be eliminated without leaving significant gaps in the plan. To insert a gap at the entry level is especially troubling, as such changes have the potential to dramatically affect the influx of new licensees, and therefore the health of the entire Amateur Radio Service.

3. It seems clear that the no-code Technician Class is now the entry level ticket of choice for the majority of licensees. However, it should be recognized that most no-code Technician Class operators are content to use the short-haul VHF/UHF bands, and FM or digital packet modes exclusively. The no-code Technician class is effectively an end in-and-of-itself. Conversely, the Novice and Technician Plus Classes represent the entry level for those operators interested in the world-wide H.F. bands, and the more "traditional" single-sideband (S.S.B.) and Morse Code (C.W.) operating modes.

4. If the Novice and Technician Plus Classes are eliminated, the General Class becomes the entry-level for those operators interested in H.F. communications. However, as it exists today, the General Class is not a reasonable entry level license. The written elements of the General exam require a somewhat advanced knowledge of radio theory and electronics, and so represent a significant barrier to those unable to fully grasp these subjects - especially youngsters.

5. Ham Radio begins as a hobby, but fosters volunteerism and active participation in the local community. Among other aims, H.F. Ham Radio operators further play the role of "good will ambassadors" to other countries. So, while our intentions are to foster the development of technical skills, we should not set entry level technical standards so high that young people are discouraged from participating. Eliminating both entry-level H.F. licenses while retaining two levels of advanced license, Advanced and Extra Class, creates a lopsided license structure geared toward the veteran operator.

6. I believe the existing test elements, arranged into a more logical structure, could be retained largely as-is, while providing a consistent

and challenging upgrade path. However, to devise such a structure, one must also consider the question of Morse code examination elements.

C. REGARDING TELEGRAPHY EXAMINATION REQUIREMENTS

1. The Commission acknowledges the reduced role of Morse code telegraphy in modern communications, yet must balance this reality against International requirements, and the wishes of the largely self-regulating Amateur community. While I agree that Morse proficiency must remain an examination element for the foreseeable future, I believe a substantial reorganization of license hierarchy is now called for - especially if Novice and Technician Plus Classes are to be eliminated.

2. Having spoken with dozens of operators on the subject, I have concluded that the single greatest obstacle to continued participation in H.F. Amateur Radio is the 13 word-per-minute General Class C.W. exam, element 1B. Many thousands of otherwise qualified Technician Plus operators have demonstrated an interest in H.F. voice and data communications, but in reality, few have a desire to use Morse code telegraphy. Forcing this group to attain such a high, 13 word-per-minute level of proficiency in C.W. is unreasonable and dispiriting. Therefore, I believe the entry level Morse proficiency required for meaningful H.F. voice privileges should be lowered to 5 words-per-minute.

3. As regards the testing methodology, the prospective licensee should get credit for the element if they pass the current multiple-choice, fill-in-the-blanks exam, or failing that, if they have one minute of perfect copy. Anything in between, such as "two minutes of reasonably accurate copy", is subject to interpretation by the VE, and therefore increases the potential for mistakes or abuse.

4. As regards the higher speed C.W. elements 1B and 1C, the speed requirements should be lowered to reflect the diminishing emphasis on Morse code telegraphy in modern communications. I believe a 10 word-per-minute speed for element 1B, and a 15 word-per-minute speed for element 1C are sufficiently challenging. In my experience, it is very difficult to send Morse code accurately by hand at speeds greater than 18 words-per-minute. Operators wishing to send at greater speeds do not need a higher class of license in order to do so.

D. A PROPOSED AMATEUR LICENSE STRUCTURE

1. I would like to submit the following Amateur license structure for consideration. I believe it provides a logical structure, meets International regulations, fulfills the Commission's desire to eliminate redundancy in the Amateur Service - streamlining operations, and allows those operators most interested in H.F. communications a consistent framework for upgrading. If the Federal Government truly has a vested interest in a strong Amateur Radio Service, it would do well to consider this structure, or something similar.

Class D (Technician)

Test Elements 2 and 3A

Privileges: All amateur privileges above 50 MHz.

Class C (General)

Test Elements: 1A (5 WPM C.W.), 2, 3A

Privileges: All amateur privileges above 50 MHz, and current General privileges below 30 MHz with a maximum power output of 200 watts PEP.

Class B (Advanced)

Test Elements: 1B (10 WPM C.W.), 2, 3A, 3B, 4A

Privileges: Current Advanced privileges.

Class A (Extra)

Test Elements: 1C (15 WPM C.W.), 2, 3A, 3B, 4A, 4B

Privileges: All amateur privileges

In explanation:

- a. All Amateurs would retain the privileges of their current license.
- b. Novice licenses would no longer be issued.
- c. The "no-code" Technician (Class D) remains as-is.
- d. Current Technician Plus licensees are automatically upgraded to Class C, and in addition to their current privileges, would immediately be eligible to use General Class frequency allocations and communications modes at a reduced maximum power output of 200 watts PEP.
- e. Current General licensees renew as Class C, but their current power limitations are grandfathered.
- f. Current Advanced licensees renew as Class B.
- g. Current Extra licensees renew as Class A.

In conclusion, I support the elimination of the Novice and Technician Plus licenses only in the context of a reorganization of other H.F. license classes. Specifically, I am opposed to the elimination of these entry-level H.F. licenses without a corresponding reduction in requirements for the General license, or a complete restructuring like that outlined above.

E. REGARDING GREATER VOLUNTEER EXAMINER OPPORTUNITIES

1. I believe that VEs should be allowed to administer any test which they have already passed - including the license class that the VE currently holds.

F. REGARDING THE ELIMINATION OF RACES LICENSES

1. I have no objection to the Commission discontinuing the RACES station license.

G. REGARDING WRITTEN EXAMINATIONS

1. I believe VECs and VEs already have all the flexibility necessary to produce exams which are a subset of the approved question pools. I do not believe VEs should be re-phrasing questions, or requiring written essays in place of multiple-choice exams.
2. With the number of different modes of communication available today, it would be very difficult to test for specific knowledge beyond the general topics. For example, one does not need to be an expert in TCP/IP to effectively use that transport control protocol in packet radio.

Thanks for your consideration.

Regards,

- Michael Borowiec, N9EUZ

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