

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of) WT Docket No. 98-143
)
1998 Biennial Regulatory Review --) RM-9148
Amendment of Part 97 of the) RM-9150
Commission's Amateur Service Rules.) RM-9196
)

Comments of Clay Redden, KC4YAU, Prattville, Alabama

Members of the Commission:

Thank you for the opportunity to address the proposed restructuring of the amateur radio service.

I was licensed as a technician class amateur radio operator with the call sign of KC4YAU on March 26, 1991 and my license is set to expire March 26, 2001. I also was issued a Federal Communications Commission Radio Telephone Third Class Operator Permit with Broadcast Endorsement (Number P3-6-52947) on June 21, 1976.

In 1991, the commission took the first step in moving the amateur radio service into the 21st century with the creation of the ``no-code'' license. Now, with the new century just over a year away, it's time for the commission to take a second step.

Specifically, I would like to speak in favor of eliminating the current requirement that amateur radio operators must demonstrate mastery of Morse code before being granted high frequency privileges in the amateur radio band.

I agree with the commission's assessment (NPRM 98-143 Para. 19-21) as to the decreasing role of Morse code in contemporary communications. It is a well known fact that most of the military forces of the United States and other countries as well as commercial concerns have abandoned Morse code radio transmissions in favor of more technologically advanced forms of communication such as data and satellite transmission.

Let me make it clear, I do not oppose the continued use of Morse code on the amateur bands, only the code testing requirement. If the code requirement were abolished, I personally would use Morse code. However, instead of using a key I would use a computer to send and receive.

Computers are already used in the amateur radio service to transmit data by Packet mode and by RTTY mode and there's no requirement that an amateur radio license applicant show that he or she possesses the ability to type or possesses detailed technical knowledge of computers.

I believe if the code requirement were abolished you would find many amateur radio operators likes myself who would use code, albeit through computers. Abolishing the code requirement might encourage the manufacturers of amateur radio equipment to use existing pocket computer technology to put miniature keyboards and readouts on their transceivers which could encourage increase use of Morse code.

I am aware that the United States is presently bound by international treaty to test for Morse code proficiency. However, the treaty does not mandate -- to my knowledge -- different code speeds for different amateur radio class licenses. I would support a single code speed test of no more than five (5) words per minute for all HF classes of licenses but only on the condition that the commission also include language in any act, resolution or rule change related to code speed that code requirements will automatically end within three (3) months or less of the elimination of Article S25.5 of the international radio regulations.

There are those who would say that since I support abolishing the code requirement I want to make it easier for people to get on the amateur HF frequencies.

That's not so.

I firmly believe that the written test should be longer and considerably tougher than it is now. But to suggest that mastery of Morse code somehow makes for a higher quality amateur radio operation simply can't be substantiated.

In closing, I would also like to ask the commission to consider restructuring the amateur radio license classes and support the suggestion that there be only three classes, Technician, General and Extra. I also would like to see the commission take a more aggressive stand on enforcement of amateur radio rules but I understand budget considerations make that unlikely.

Again, I ask you to please give serious consideration to eliminating the Morse code requirement, restructuring of the license classes and increased enforcement.

Thank you for the opportunity to address you on these issues.

Sincerely

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