

Gentlemen:

As the holder of Technician class license KD6MOG this NPRM is of interest to me.

For brevity I will only be commenting on particular sections of WT Docket No. 98-143, as released August 10, 1998, and will refer to these sections by paragraph number.

Under "Number of License Classes"....
Para. 12:

I concur with the phase-out of the present Novice class license. However, this paragraphs states "In addition, Novice Class operators would be eligible for examination credit for the telegraphy requirements for any license class." This is ambiguous -- a literal reading would imply that a Novice (with 5WPM telegraphy skill) would be given credit for the (present) 20WPM Amateur Extra class should they pass the written exam; surely not the desired result!

With regards to the power/frequency restrictions within the present Novice bands. I concur with permitting current Novice licensees expanded access to the 80, 40, 15, and 10 meter bands though, of course, this should not exceed the access of a General class license with the current 200W power limit. I do not concur with allowing other license classes increased power within the current Novice bands, rather feeling these should become a "safe-harbor" for medium power operators.

Para. 13:

I find this confusing. It appears to imply that under the new licensing scheme, the entry to HF privileges will require a General class license (with 13WPM telegraphy), with existing Technician Plus holders grandfathered under the Novice phase-out to the HF bands.

My summary for License Classes:

I visualize four classes: the current no-code Technician as the entry level, a General class license with a reduction in the telegraphy requirement to 5WPM but no change to the written exam, Advanced class at 13WPM and no change to the written exam, and the current Amateur Extra class (at 20WPM). This makes the General class license the HF entry class.

Under "Telegraphy Examination Requirements"....
Para. 23 and 24:

In consideration of a removal/reduction in the Morse telegraphy requirement resulting from a future WRC, I concur to the future reduction of the Amateur Extra speed from 20WPM to 13WPM. However, in light of my comments above (My summary for License Classes) should this WRC remove the telegraphy requirement totally, I would propose that the General class become a no-code HF class (with current or slightly expanded written exam). The Advanced class would then be reduced to have a 5WPM telegraphy requirement, with comparable expansion of the written test.

Classes	Proposed	Future
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Technician	no HF	no HF
General	5WPM	no code
Advanced	13WPM	5WPM
Extra	20WPM	13WPM

In view of the deprecation of Morse telegraphy, I do feel that the entry to phone operation in the HF bands needs to be simplified. A 5WPM General license would serve this purpose.

Para. 25:

I concur with the ARRL request that examinees at least attempt the higher speed telegraphy test even if they have obtained a physician's certificate. I do not agree with the opening of medical records although requiring a short comment from the doctor as to why he/she believes the waiver is needed might be acceptable.

Sincerely,

Dennis Lee Bieber
KD6MOG