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OCT 26 1998

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FCC Secretary  
Magalie Roman Salas  
Federal Communications Commission  
1919 "M" Street N.W.  
Washington, D.C. 20554

ORIGINAL

RE: WT Docket 98-143

In the matter of 1998 biennial Regulatory Review--Amendment of Part 97 of the Commission's Amateur Service Rules, FCC WT Docket 98-143 I submit the following comments.

Upgrading Technician-plus:

I would like to register my opposition to any proposed additional testing of currently licensed Technician-plus amateurs, for the purpose of upgrading to General class, which have held their tickets for more than twenty years. My reason for this opposition is that at the time we took the original Technician exam it consisted of the same elements that were required for General class with the exception of code speed. Currently licensed Technician-plus operators, who have held their licenses for more than twenty years, should be grandfathered into General class without further testing if code speed for General class is reduced to 5 WPM.

Code speed:

In the case of a no code requirement, unless newly licensed operators are barred from using code, the requirement for passing a code element is not a bad concept.

General observation:

With todays digital equipment and everyone's desire for quick painless results, one should consider what exactly does possessing a theoretical knowledge of radio do for the operator? Hardly anyone builds thier own equipment anymore; equipment is purchased from the local ham shack or via mail order. Equipment failures are for the most part handled in the same fashion; the rig is returned to the ham shack or local repair shop for corrections. Todays amateur license requirements are rooted in days long past. More appropriate for testing todays applicants might be focusing on operating concepts, more propagation theory, and general courtesy.

Sincerely,



Daniel R. Swanner  
N3RPJ

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