

Dear Commissioners,

In response to your 1998 biennial review of regulations pursuant to Section 11 of the Communications Act of 1934, as amended, I offer the following comments.

1. I agree that there are too many license classes and that the number should be reduced from the current 6 to the proposed 4 classes.
2. I also agree with the proposal made by the American Radio Relay League that the existing Novice and Technician Plus license classes should be eliminated. The remaining license classes would be Technician, General, Advanced and Amateur Extra.
3. The Technician license would become the only entry point into amateur radio. Technician privileges should not be changed - and they should be limited to only amateur frequencies above 30 MHz. The associated license exam should be changed to reflect the use of VHF and above frequencies only. All reference to HF frequencies and operating practices should be eliminated from the Technician examination. This will provide an easier entry point for new operators as they will not have to be tested on subject matter for which they have no frequency privileges.
4. I agree that the General class license will be the entry point to HF operating and further agree that a morse code requirement of 5 words per minute is sufficient as a requirement. Also, it is appropriate to add HF operating procedures to the written examination element here.
5. I further agree that the Advance class license should be changed to require a 12 words per minute morse code requirement plus an additional theory test.
6. The amateur extra license currently requires a 20 word per minute morse code speed. The ARRL proposes a 12 word per minute speed here. While I would prefer to see 20 words per minute retained, I understand the rationale behind the change to 12 wpm. The increase in code speed here is desirable only as additional practice and perseverance shows motivation on the part of the applicant.
7. The Novice sub-bands should be reformed as per the ARRL proposal.
8. I favor the fill-in-the-blanks type of CW testing examination and propose the multiple choice examination be eliminated. One minute of solid copy would be acceptable for passing also, as is current practice.
9. Current Novice and Tech Plus licensees should be initially upgraded to General, but be required to take the missing exam elements to renew their licenses. This is similar to the original intent of the Novice license, where the applicant has a fixed amount of time to upgrade. Novices would be required to take the Technician and General written elements. Tech Plus licensees would be required to take only the General written element. Any Novice who does not upgrade within the time frame would lose all privileges. Any Tech Plus who does not upgrade would be downgraded to Technician.
10. The current system of code waivers should be eliminated. The current system of accommodation of applicants is sufficient to address the needs of disabled examinees. In the rare situation where no fair accommodation seems appropriate, the FCC Field Office should make the determination following explicit guidelines and after discussion with the attending physician. The FCC alone would then issue a waiver certificate, and a candidate who presents an FCC waiver certificate to a VE would not need to explain further, preserving their right to privacy. Any candidate for a CW exam waiver should attempt an accommodated test before being allowed a waiver. The VE as volunteer does not have the authority or skill to judge the merits of a physician's medical waiver. The FCC as the regulator is the correct party to make this judgement.
11. Advanced Class VE's should be allowed to administer exams to and sign off General class applicants.
12. I heartily endorse allowing ARRL Official Observers, as part of the Amateur Auxiliary, to bring forth a private sector complaint of malicious

interference directly to the Chief Administrative Law Judge (CALJ). The process of bringing complaints of interference to the Commission should allow the OO's to include a draft order to show cause to initiate a revocation or cease and desist hearing proceeding. There must be a quicker, easier method of initiating and concluding administrative proceedings against the most egregious offenders. A small amount of FCC enforcement against the worst violators will serve the amateur radio community well and discourage others from violating both the spirit and letter of the rules.

13. I disagree with the ARRL's newest proposal to allow Technician operators (without any morse code credit) to be allowed access to the HF bands below 30 MHz. Assuming the proposal as outlined above is accepted, these operators may not have studied nor have been tested on HF operating practices. Plus, it would be onerous on the Amateur Auxiliary to determine who does or does not have HF privileges. These operators should be required to pass the 5 wpm morse code test first plus the General class theory test which will include HF operating procedures before being allowed access to the HF bands.

14. In conclusion, I basically applaud the ARRL proposal for altering the license structure from 6 to 4 classes of amateur radio license with the above changes.

Sincerely, George Tranos N2GA

Amateur Extra Class licensee and Volunteer Examiner