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To: The Secretary
Federal Communications Commission
Washington, DC 20554

c.c: Chairman Willaim E. Kenard
Commissioner Susan Ness
Commissioner Michael Powell
Commissioner Harold Furchgott-Roth
Commissioner Gloria Tistani

Before the
Federal Communications Commission

In the Matter of WT Docket No. 98-143: Restructuring of the Amateur Service, Part 97.

Summary: Three classes of license and one level of Morse Code proficiency at 5 words per minute are the two most essential components the FCC should include in their final proposal for the "Restructuring of the Amateur Radio Service." These provisions, if adopted, would have the immediate effect of (1) Reducing the work load of the FCC -- three licenses in place of six, (2) streamlining the amateur testing program relevant to current and future technology and (3) Facilitating the growth of the amateur service.

Provision 1: Number of License Classes:
My personal view is that the FCC proposal does not go far enough towards modernizing and streamlining the amateur service. The proposed four classes of licenses are too many and appear to reflect old guard ARRL thinking only. It is suggested that three classes are sufficient. Elimination of Novice, Technician Plus and Advance classes and retention of Technician, General and Extra are proposed instead. Current Novice and Technician Plus licensees should be "grandfathered to General Class operators. Current Advanced class licensees should be "grandfathered" as Extra class operators.
This provides for the Technician class as the entry level to amateur radio and entail VHF privileges, a basic written test but no Morse requirement. The General class would grant full HF privileges and consist of written examination for technical competence and a 5 wpm maximum Morse code reception proficiency requirement. Extra class would consist of a comprehensive written examination of technical and operational proficiency and signify a superior knowledge and achievement in all ares of theory and amateur practice. No additional Morse code proficiency would be required for this class as Morse code is just one of many communication techniques. Frequency allocations could and in fact should continue to reflect the differences in classes of licenses as currently exist between General and Extra class licensees. This proposal puts the United States in line with other CEPT counties who, at the most, currently have but three license classes -- two HF and one VHF.

Provision 2: Morse Code Testing at 5 wpm Maximum
I strongly support the FCC's suggestion to replace the current Morse code requirement with more relevant written testing on the current and developing technologies as they apply to the amateur radio service. Today, Morse code is but one of a growing variety of communications modes and techniques. There is no logical reason to single Morse code as more significant or important to the knowledge and capabilities of an amateur radio operator. A single 5 wpm Morse test meets or exceeds all current International agreements, significantly reduces the necessity of processing and issuance of waivers for handicapped applicants and certainly reduces the overall costs of amateur radio examinations. Eventually all Morse code testing will be eliminated consistent with United States obligations under International treaties.

Adoption of the preceding suggestions would simplify the licensing process and make sure that amateur radio services would continue an ongoing service to the country well into the twenty first century.

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I have been licensed since the 1960's and contrary to popular opinion, strongly believe the ARRL does not reflect the mood of the entire amateur community and most probably does not even represent the majority of amateur operators in the United States today. It is my belief inputs from the ARRL should carry no more weight than those from any rank and file operator. I am pleased that the FCC appears to be providing a very balanced view of individual as well as league proposals.

Respectfully submitted,

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Dated: 27 October 1998