

**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 Commission's |) | <u>RM-9150</u> |
| Amateur Service Rules |) | RM-9196 |
| |) | |
| |) | |

COMMENTS OF

Edward J. Plesnar of 305 Hoffman Avenue; Vestal, NY 13850. Holder of an Amateur Advanced Class License and Amateur Call KB2SCF.

I Edward J. Plesnar file these comments on October 18, 1998 in the FCC's Notice of Proposed Rule Making WT Docket 98-143.

As a licensed operator in the Amateur Radio Service I read the FCC's *Notice* with great interest and I take this opportunity to respectfully submit my Comments. I obtained my first Amateur Service License in 1994 as a Technician and I have continued to hone my technical skills and advance in the Service -- first to Technician Plus, then to General, and now to Advanced. I

plan to continue my progress in the Service and it is my personal belief that the Amateur Radio Service provides a valuable and useful training ground in the Electronic and allied arts. I also feel that it provides a valuable communications channel in times of emergency and that it is in the public interest to structure the Service and its Regulations in a way that develops a large and well-trained pool of operators.¹

Summary

In my Comments I make the following proposals:

- I suggest that the Morse Code Requirement be standardized at five and twelve words per minute.
- I propose reducing the number of License Classes to four and I propose merging the existing Novice, Technician Plus, and General Classes into a single Class.
- I agree with the proposal to allow greater opportunity for Volunteer Examiners and I offer comments on the Testing Procedures.
- I support the elimination of Radio Amateur Civil Emergency (RACES) Licenses.

Morse Code Requirements

The FCC's comments on a diminishing need for skilled Radio-Telegraphers are well put and should form the basis for any discussion of Morse Code Requirements in the Amateur Service.² Nonetheless, it is worth noting that this mode is still used quite extensively in the Amateur Bands and to dismiss it as "irrelevant" or "obsolete" in those bands would be inaccurate. This also seems to be a very emotional issue where striking a middle ground of compromise is

difficult.

In making my comments I refer to the FCC's previous Morse Code Requirements and to the general tendency in easing the requirements which has been demonstrated by various National Telecommunications Authorities and Radio Associations.³ It seems that a speed of five words per minute is adequate for an entry license to the High Frequency Bands. It is a proficiency which most persons can attain with application and study and it fulfils the rather open requirement for a "demonstrated proficiency" required by International Regulations.⁴ Granting a comprehensive level of operating privileges in return for a five word per minute proficiency seems reasonable. Gearing the next level of authority to a technical and operating exam (as outlined below) provides an avenue of advancement for those who do not choose to attain greater Morse Code proficiency while providing an additional class above for demonstrated Morse, Technical, and Operating proficiency recognizes the extensive use of Morse Code on the Amateur Bands and provides an incentive for developing proficiency in that Mode. Twelve words per minute seems adequate for this demonstration.

Regarding the type of test: There has been extensive debate in the Amateur Community regarding the "Straight Copy" vs. "Multiple Choice" tests. It is my belief that both types of exam have their place and that the candidate for a Morse Exam should be offered both. Although it can be argued that a "Straight Copy" exam is harder to pass on luck, I submit that many high-speed operators, by their own admission, only copy the more important parts of a Morse Code Exchange.⁵ While a "Straight Copy" requirement might be appropriate for a commercial operator handling cipher communications, it really has no place in the Amateur Service. License Class

Structure.

I agree with the FCC conclusion that the Novice License is no longer necessary as an entry level license. The Relation between the Novice and Technician material leads to some redundancy in the licensing structure. Two entry level license classes are unnecessary and the statistics quoted by the FCC clearly suggest that the Technician Class has become the entry level of choice for the majority of new licensees. I suggest that the Novice Class be abolished and that the Technician Class become the first grade of Amateur Service License. As in the present structure, this class should confer full operating privileges on the VHF and higher Bands (50 MHz and above) and it would be earned by an examination covering Basic Electronic Theory and Operating Procedures with no Morse Code Requirement.

I propose that the Technician Plus Class be abolished. As stated previously, I believe that five Words Per Minute Morse is sufficient for meaningful access to the High Frequency (HF) Bands and in this context the Technician Plus Class is superfluous.

I suggest that the second grade of Amateur Service License be the equivalent of the General Class and that it be earned by passing an examination covering more general issues of Electronic Theory and Operating Procedures. In addition, to satisfy International Requirements, a Morse Code proficiency of five words a minute should be demonstrated. I believe that this level of ability should be sufficient for any distress or emergency situations which might arise.

The third grade of Amateur Service License that I propose would be the equivalent of the Advanced Class License and would be earned by demonstrating additional Technical and Operating proficiency. I do not believe that an additional Morse Code examination is warranted

for this grade.

The fourth and Final Grade of Amateur Service License which I propose would be the equivalent of the Extra Class Amateur License. To obtain this grade of license it would be necessary to demonstrate both Technical and Operating proficiency as well as to pass a twelve word per minute Morse Code exam.

With regard to the “abolished classes” (Novice and Technician Plus) I support the American Radio Relay League (ARRL) proposal to consolidate them in the second (General) grade of Amateur Service License. While this provides an “automatic upgrade” for these License Classes, it simplifies the structure and makes it unnecessary for the FCC to retain these Classes in its Database.⁶

I believe that this proposed structure provides: (1) A clear entry point into the Amateur Service and (2) A reasonable upgrade path that brings the Morse Code Requirement into better alignment with other National Telecommunications Authorities.

Volunteer Examiners and Testing Procedures

I agree with the principal that a Volunteer Examiner (VE) should only administer those elements which he or she has already passed and to this end I support the FCC and ARRL proposal to expand the authority of Advanced and General Class VEs.

Regarding the content and administration of the examinations, I suggest that while some differences of “style” between the various Volunteer Exam Coordinators (VECs) is appropriate, there should be a uniformity in the content of the examinations and their manner of administration.

I therefore make the following specific proposals:

- The examination questions for material covering technical and operating proficiency should be drawn from a public pool as is done today.
- The questions should be multiple choice.
- It is my belief that the application of theory is more important than simply “memorizing answers” and I propose that the examination material include a sheet of equations and constants for the person taking the test to refer to and that, as is the case today, electronic calculators be permitted for the exam. I feel that these two tools would encourage the development of the skills needed to solve a problem rather than the memorization of questions in the pool.⁷
- I believe that the Morse Code Examinations should be specified to allow both the Multiple Choice and Solid Copy options for all tests. In other words, the person taking the test should always have the option of taking the test both ways.⁸
- If the sending portion of the Morse Code Examination is to be optional, I believe that the FCC should specify the criteria for when a VE may elect to administer a Morse Code Sending Examination.

RACES Licenses

I am in agreement with the FCC proposal to discontinue the renewal or RACES Licenses. Since RACES Communications are conducted under the authority of a competent Civil Defense Organization, there should be no need for a special License or Call Sign.

CONCLUSION

I believe that the above modifications to the FCC *Notice of Proposed Rule Making WT Docket 98-143* provide a needed simplification and rationalization of the Amateur Service Rules. By simplifying the Licensing Structure and bring the Morse Code Requirements into line with the technical and communications requirements of today, I believe that the Service will be improved and that additional operators will be attracted to the Amateur Service. I also believe that these proposals are consistent with the FCC's stated purpose for Amateur Radio.

Submitted By:



Edward J. Plesnar

305 Hoffman Avenue

Vestal, NY 13850

October 18, 1998

Notes

1. See FCC *Regulations §97.1*.
2. Specifically, FCC *Regulations §97.1(c)*. In view of the fact that many Radio Services — particularly the Marine and Lifesaving Services — are discontinuing the use of Morse Code it seems that proficiency in this mode is less relevant than in the past for “trained operators”.

3. New Zealand in particular has suggested that the International Regulation requiring Morse Proficiency for access to the High Frequency (HF) Bands be eliminated while in Germany and Great Britain the National Organizations have proposed substantial reductions in the degree of proficiency required for access to the HF Bands.
4. Note that the original requirement for Morse Code Proficiency developed at time when that Mode was extensively used by the Commercial Services and that it might be necessary to “warn off” an Amateur Station that was inadvertently interfering with Commercial or Distress Traffic. It is well to keep this reason in mind while discussing the Morse Code requirement at a time when other modes are typically used for Commercial and Distress Traffic.
5. A review of the literature on “learning the code” reveals a general emphasis on the importance of copying only the “important things” as the student attains greater speed. Many high-speed Morse Operators offer the same advice when asked about the best way to “develop speed”. A multiple choice test thus reflects “good amateur practice” in this area.
6. Since the “FCC Grant” of a License is sufficient to confer Operating Privileges, it is sufficient for the FCC to update its Database without issuing a new “paper license”. An alternative would be to retain the existing classes in the Database with the understanding that “Novice”, “Technician Plus”, and “General” are defined to be the same Class and to update those Classes to the “new” Second Class name as they are renewed.
7. Informal discussions with other Amateurs as well as with Engineers and others in the Technical Professions leads to the conclusion that most do not “remember all of the equations and constants”. Instead they tend to remember the general principles and to refer to *Handbooks* for specific formulas and constants. Permitting outside materials in a test seems unwise, but a sheet of standard formulas and constants prepared by the VECs seems a reasonable approach and might have the additional benefit of improving the quality of questions in the pool so that they emphasize theory instead of catching memorization.
8. See discussion in *Morse Code Requirements* above.