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FEDERAL COMMUNICATIONS COMMISSION

Oct. 26, 1998

To: The Secretary
Federal Communications Commission
Washington, DC 20554

c.c: Chairman William E. Kennard
Commissioner Susan Ness
Commissioner Michael Powell
Commissioner Harold Furchgott-Roth
Commissioner Gloria Tristani

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Before the
Federal Communications Commission

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

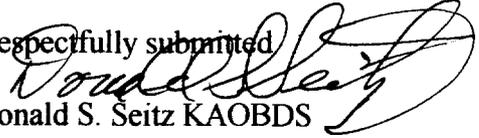
Summary: Two the essential changes that the FCC should include in their final proposal for Restructuring of the Amateur Radio Service are three classes of licenses and one level of code proficiency at 5 words per minute. Adoption of these two provisions would: a) reduce the FCC work load from six licenses to three, (b) Facilitate growth of the amateur service, (c) streamline the testing program and broaden the population of radio amateurs by stimulating interest in amateur radio.

PROVISION 1. Number of License Classes:

I would suggest that the number of classes be reduce to three, these being Technician, General and Extra class. The current Novice and Technician Plus licenses could be "grandfathered" to General class and the Advanced Class licenses could be "grandfathered" to the Extra class License. The Technician class should be the sole entry class license. It would have no code requirement, but would require a written exam. It would have some VHF privileges. General class would grant full VHF privileges and have a written exam and a 5 wpm Morse code requirement. The Extra class license would entail a comprehensive written exam and signify superiority in knowledge of theory and practice , but would entail no additional code proficiency. Frequency allocations can continue to reflect differences in an appropriate fashion as is currently the case. This kind of system would put the United States in alignment with other CEPT countries who, at the most, have only three license classes - two HF and one VHF.

PROVISION 2. Morse Code Testing at 5 wpm Maximum.

I support the FCC's suggestion to replace the Morse code requirement with more relevant examinations on the various aspects of the current developing technology. Today, Morse code is in the backwash of technology. It is merely one of many methods of communication and should not be singled out as one of particular importance. A single 5 wpm Morse test will remove the necessity of categorizing the handicapped. Eventually, all Morse testing should be eliminated consistent with US obligations under international treaties.

Respectfully submitted


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