

Oct. 26th, 1998

Ms Magalie Roman Salas
Office of Secretary
Federal Communications Commission
1919 M Street
Washington, DC 20554

Refer: "FCC Notice of Proposed Rulemaking,
WT Docket No. 98-143."

Dear Commission Members,

This is concerning the changes in license classes for Amateur Radio Operator License Classes. The reason restructuring is needed is the less dependence on CW (Continuous Wave) Mode under FCC Rules no. 97. There still is valid uses of CW but more and more agencies are eliminating it. It is slow compared to modern data transmission types. Most European countries have eliminated several classes and have basically 2 classes. Several governments are in the process of eliminating completely the requirement for CW (Morse Code).

My suggestion is 4 classes of Licenses:

1. Class A, General License class with code speed of 5 words per minute skill (would get present band coverage and privileges of the present Novice, Technician, and General Licenses,
2. Class B, Extra-Advanced License with all privileges of present Novice, Technician, General, Advanced, and Extra. It could have 5 words per minute or 10 words per minute. Most of the older amateur radio operators had to pass big hurdles on learning Morse Code to get there license and have the fraternity initiation type of mind set that future people must go through the same 'rite of passage'. This is not necessary in these modern times.
3. Class T, Technician License with all present Technician privileges.
4. Class TA, Specialist which is Technician plus data and voice privileges of Class B, Extra-Advanced licenses but not in reserved CW band spectrum. The requirement of CW (Morse Code) has no bearing on use of phone (voice) and high speed data transmission types in these bands. It is just a means of preventing other license classes holders of using it. The Class T holder would have to pass the written parts of Class B requirement.

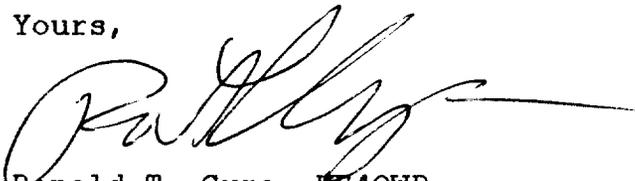
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The conversion of present licenses to new ones would not be unduly hard. You could put a 3-5 year extension on present licenses and give them the time to covert. Present Novice takes written General and Technician tests. Present Technician-Plus could take General written or revert to Technician and lose CW certification. Present Advanced could take written Extra and be Class B, since higher word speed has been met.

These classes would close the gap to present world class use. It would remove the obstacle of the higher CW requirement and basically eliminate the handicapped requirement.

Yours,

A handwritten signature in cursive script, appearing to read 'Ronald T. Cyre', with a long horizontal flourish extending to the right.

Ronald T. Cyre, KE4QWP
6423 Colgate Road
Jacksonville, FL 32217-2450

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) RM-9150
Commission's Amateur Service Rules.) RM-9196
)

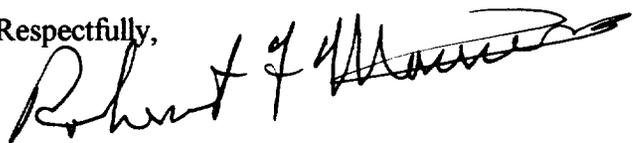
COMMENTS OF ROBERT F. MANNING
922 E. Cullumber Street
Gilbert, Arizona 85234

I am a licensed amateur radio operator living in the state of Arizona.

1. I agree with the FCC's assessment (NPRM 98-143 Para. 19-21) as to the decreasing role of Morse code in contemporary communications.
2. I believe the use of Morse code by amateurs is now totally within the confines of recreational purposes only. It has been replaced by more modern means of communication.
3. I believe that there is no longer any public/governmental interest served by requiring code testing.
4. I believe, therefore, that ALL testing of Morse code should be ended.
5. I also recognize the existence of the international Radio Regulations, Article S25.5, (NPRM Para. 22) and suggest an interim requirement of ONLY a single code test with only the minimum speed necessary to meet international treaty requirements, but in no case, more than five (5) WPM for all HF license classes until such time as Article S25.5 is deleted.
6. A single minimum code speed examination would also eliminate the need to grant medical waivers to disabled amateurs for the higher speed telegraphy requirements. (NPRM Para. 25 and RM-9196)
7. I suggest that any interim code requirement used to fulfill the international Radio Regulations, Article S25.5, be written to include language that would automatically end the interim code requirement within three (3) months or less of the ending/elimination of Article S25.5.
8. As a result of all Morse code testing being 5 WPM and considering the small difference in privileges between the Advanced and Amateur Extra Class, I believe only three license classes are needed. These classes would correspond to the current Technician, General and Amateur Extra Class.

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Respectfully,

A handwritten signature in black ink, appearing to read "Robert F. Manning". The signature is written in a cursive style with a prominent loop at the end.

Robert F. Manning

N7VKS

FCC W T DOCKET 98-143

NOV 2 1998

To The FCC Representatives for Hams:

This letter I hope will not sound like rehash of previous letters from others. It is my first letter to the FCC. Please bear with me awhile.

First, I have been a ham since 1963, a general from the start, with all privileges. Then incentive came. To keep it all I upgraded. Now the league (ARRL) wants a reverse (in my opinion) of our standards. I did work hard for my ticket and no matter what, I think any new hopeful should do the same.

HOWEVER!

NR1 Since radio is international, not only do our signals go around the world, but all related topics, including licensing.

NR2 As Americans, we should keep up a strong example of high standards. To lower any form to a lower rating, would say to the world (and also to all of us hams) we are spoiled, we get what we want, I have money for a new toy, but can not be bothered with the trouble of showing my proficiency (namely tough? testing) etc.

NR3 There are all kinds of people who are already hams, and who knows how many are waiting their turn. True, CW turns many off the hobby.

Now I come to the main gist of my letter, hopefully a fair plan to keep all people happy, and not lower our standards.

MY PLAN: BASICALLY

A: Let people into ham radio via NO CODE (and I am sworn to CW) ticket. Give them phone only VHF and / or perhaps 10 meter phone to give a sample of international radio.

B: New Extra, Advanced and Generals can also take a no code test for phone only. No CW FREQUENCIES. This will still allow for upgrading to get the Extra and Advanced phone bands.

C: Anyone after that can take a CW test to gain the equivalent Code portions of the bands of their class ticket. (Or do this the first time around - - or never!)

SIMPLE: You don't want CW, you don't get the privilege to be there. Everyone can get only what they want from ham radio. The more you want, the harder you strive for it. This will keep our standards high and our quality high. Solid copy of CW is the only test the code speed should remain the same as before. Keep standards high. FCC tests by equal to or below is fine (VEC) Enforcement of regulations to wrong doers should be quick and severe. No wrist slapping. Get the garbage out of ham radio.

DOCTORS NOTES:

No one, who can not take a test to prove his or her abilities, should have privilege. If they can not do it at a test, how can they do it at home? Give credit for only what is shown and earned.

I think that in this day of buying gear in the store, the tests are hard enough. Maybe they can be modified to be sure a person knows what they are doing, both for safety and world wide representation of signals and operating practices of our USA operators.

I have nothing against phone operators, but I wish they would stop crying about CW. Give them a ticket for phone only if that is what they want.

As for the frequencies available if the novice portions are no longer needed.

The ARRL said give them to phone!

NUTS !!!!!

Divide it in proportion to the way the bands are now.

CW - RTTY - Digital ETC... Can all use a share of what may be available.

I am not a writer. If my letter is unclear I will gladly respond to any mail.

Respectfully,

William Ustaszkeski
WA2DUV Extra
525 Cedar Ave
Lindenwold, NJ 08021