

Introduction

I am the holder of an Advanced Class operator license, a member of ARRL, a member of three Amateur radio clubs, an accredited VE with both ARRL and W5YI, and a volunteer in the RACES program in the State of California. I am offering these comments based on my observations and knowledge of the amateur service.

Executive Summary

In this comment I support and propose the following:

- A reduction in the number of license classes consistent with an included restructuring proposal of the classes,
- Greater Volunteer Examiner opportunities,
- The elimination of the RACES station license as proposed,
- Reduction in the number of telegraphy elements, and
- Revision of the content of the written exams, but not in the administration of them.

A. Number of License Classes

The current six license classes do not represent the current needs of the service. The Novice Class is underutilized and no longer represents the entry point of choice into Amateur Radio. Likewise the Technician Plus doesn't provide a meaningful set of HF privileges. The burden of preparing and administering examinations placed on the VE's has been overestimated. The current number of written elements and code elements is not a problem of administration, but a problem of content not matching the privileges earned.

I would propose a license restructure that goes beyond either the FCC NPRM or the ARRL proposal but matches more closely the activities of Amateurs and yet provides incentives to encourage amateur operators to advance their skills in meaningful ways.

The following summarizes the proposed license classes. Following the proposal are additional detail for test elements, progression, and privileges. In order to not confuse the proposed license structure and testing elements with the current Classes and elements, I have used different names.

Class: Basic

Privileges: Basic VHF/UHF bands, limited power and modes

Knowledge: Basic radio theory and operation and regulations

Class: Standard-VHF/UHF

Privileges: All VHF and up bands, full power, all modes.

Knowledge: Advanced radio theory and operation as it pertains to VHF and up bands, additional regulation.

Class: Standard-HF

Privileges: Standard HF bands, limited power, CW and phone.

Knowledge: Basic HF radio theory and operation, slow-speed CW, additional regulation.

Class: Standard-Combined

Privileges: all associated with Standard-VHF/UHF and Standard-HF

Knowledge: same as Standard-VHF/UHF and Standard-HF

Class: Expert

Privileges: all privileges afforded the Amateur License Service

Knowledge: Advanced radio theory, operation, and regulation. Hi-speed CW.

Progression from Basic to Expert would either be:

Basic, Standard-VHF/UHF, Standard-Combined, Expert or,
Basic, Standard-HF, Standard-Combined, Expert

The Standard licenses could be considered as a single license with multiple endorsements.

This structure recognizes the existence of a set of activities that are centered around the VHF and up frequencies, a set of activities centered around the HF frequencies, and a set that spans both the HF and VHF and up frequencies. This allows an amateur to progress to the level of license class that matches his/her interest in the Amateur Service, yet provides a path for those so inclined to advance their skills as much as possible.

Examination requirements:

The following are the test elements necessary for each license class:

Basic: Written 1

Standard-VHF/UHF: Written 2 plus requirements for Basic license

Standard-HF: Written 3, Code 1 plus requirements for Basic license

Standard-Combined: requirements for both Standard-VHF+ and Standard-HF

Expert: Written 4, Code 2 plus requirements for Standard-Combined.

The written elements are to be aligned more closely with the classes, unlike the anomalies in the current tests. Currently Technicians are tested on HF knowledge, but

have no HF privileges (Element 2) and the Advanced written (Element 4A) is significantly more technical than the Extra written (Element 4B). Written elements are to follow the knowledge needed for operating at the stated class and are to be progressively more technical.

Code 1 is to be 5 words per minute. Code 2 is to be 12 words per minute.

Transition from current classes to proposed classes:

Novice: The current Novice license holders to retain their existing privileges until their license expires or a grace period ends. No new Novice licenses to be issued. No renewals to be issued. Novice license holders as of the effective the date of the implementation, who remain licensed without a break, are to be given examination credit for Written 3.1 and Code 1 if they choose to upgrade.

Technician: The current Technician licenses to be converted to a Basic license.

Technician-Plus: The current Technician-Plus licenses to be converted to a Basic license. Technician-Plus license holders as of the effective the date of the implementation, who remain licensed without a break, are to be given examination credit for Written 3.1 and Code 1 if they choose to upgrade.

General: The current General class licenses to be converted to Standard-Combined. General license holders as of the effective the date of the implementation, who remain licensed without a break, are to be given examination credit for Code 2 if they choose to upgrade.

Advanced: The current Advanced class licenses to be converted to Standard-Combined. Advanced license holders as of the effective the date of the implementation, who remain licensed without a break, are to be given examination credit for Written 4.1 and Code 2 if they choose to upgrade.

Extra: The current Extra class licenses to be converted to Expert.

During a transition period of 10 years (to match the current license renewal duration), the Written 3 and Written 4 exams are to be constructed each in two parts (3.1/3.2 and 4.1/4.2). This is to permit credit for elements previously taken by the current Novice, Tech+, General and Advanced license holders. After this transition period, these written elements to be combined into a single examination and “grandfathering credit” to no longer be offered. In the course of this amount of time, the examination should have been through significant changes in content, such as regulation revisions, new technical information and safety revisions, so that the questions in the original examination would have been substantially revised.

Privileges Authorized:

Basic: Radio control on 6 meters. FM on 2 meters, 1.25 meters and 70 centimeters. 100 watts maximum.

Standard-VHF/UHF: All modes, all privileges on frequencies above 50MHz.

Standard-HF: All existing General class privileges below 50MHz.

Standard-Combined: All privileges of Standard-VHF/UHF and Standard-HF.

Expert: All privileges of existing Extra class.

Although this appears to severely reduce the privileges of the current Technician, there is a significant distinction between what is currently authorized and what is currently used.

B. Greater Volunteer Examiner Opportunities

ARRL argues for permitting Advanced Class operators to be able to administer all elements of the General Class license examination. I believe that, at a minimum, this proposal should be adopted. I believe that a further argument can be made for consistency in the authority granted. Today Extra Class operators can administer all examination elements, including those for Extra Class, where Advanced and General Class operators can only prepare and administer the examination elements for lower classes. I would propose that General and Advanced Class operators be permitted to administer examination elements up to and including the license class that they currently hold.

C. RACES Station Licenses

I agree that special RACES station licenses should be phased out. It doesn't appear to serve any necessary purpose.

D. Privatization of Certain Enforcement Procedures

I have no comment on improving the FCC's enforcement processes.

E. Telegraphy Examination Requirements.

Currently, three telegraphy examinations are prepared and administered by VE teams. From the perspective of the VE team, the telegraphy examination is the most difficult and time consuming to administer.

International Radio Regulations currently require all amateurs licensed to operate below 30MHz to demonstrate their ability "to send correctly by hand and to receive correctly by ear, text in Morse code signals." As long as this regulation exists there is no question about having telegraphy elements as a part of the examination process.

There is no right or wrong position on Code vs No-Code or the number and makeup of the telegraphy elements. Discussions turn into religious debates which makes it a highly emotional topic.

Telegraphy is a part of the amateur service and testing does provide an element of a "right of passage" that should not be ignored. However, with the de-emphasis of telegraphy in other services, telegraphy should not have a role that is much more heavily emphasized than any of the other "digital" modes.

Consistent with the restructuring proposal outlined above, and also consistent with the ARRL restructuring proposal, the telegraphy elements should be reduced to two tests, a slow speed code at 5 words per minute and a high speed code at 12 words per minute. Written elements should be enhanced to ensure coverage of current technologies, including newer digital technologies. Also there should be no changes in the method of examining code proficiency. Continue to permit the VE team to determine how to test for code speed.

F. Written Examinations

I have no comment to make on the specific topics. They appear to be adequate. I would suggest that the VEC Council be permitted to make any enhancements that they deem necessary to the topics just as they provide revisions to the question pool. I would not be in favor of any VEC or VE to be permitted to alter the question pool or vary from the standard makeup of any exam. This would jeopardize the consistency of the exam process nationwide and has the possibility of introducing questions that are poorly composed due to the lack of review.

The makeup of the exam element should be tailored to the privileges earned for the corresponding license class. Also the depth and breadth of the material should increase as additional privileges are earned. The current exams do not match this. The Technician Class written exam includes many HF only technical questions. The Advanced Class written exam is the most technically difficult written element.