

Dear FCC,

I would like to respond to the Notice Of Proposed Rule Making - Docket No. 98-143. I will make comments on portions pertaining to the restructuring of the Amateur Radio Service.

I. I would like to applaud the FCC to sunset the RACES facet of the Amateur Radio Service. I agree with the statements contained in the Executive Summary of the docket and with Section D of the Discussion portion of the docket.

II. I disagree with the changes that are proposed to modify the current telegraphy requirements to gain access to the high frequency (HF) bands. Rather, I believe it is more desirable to leave the telegraphy requirements as they are now: five, thirteen, and twenty words per minute (WPM) of Morse code receiving by ear. Nothing worth working for is easy and we are relying too much on technology. There is nothing wrong with learning Morse code in order to gain access to the HF Amateur Radio bands. There's always the potential for the communications infrastructure to collapse and Morse code is the only mode of communication has the unique ability to be received and heard on the HF bands when all other forms of communication fail, such as telephony, packet (digital) and slow scan television.

I am of the opinion that the technical and maturity level of some of the code-less technicians has shown me that some are not ready for access to the HF Amateur Radio bands. Much to my disappointment, the VHF/UHF bands have been almost destroyed by the Citizens Band mentality of the code-less Technicians. For example, I have heard the jamming of a repeater input with music or obscene language on several occasions. Also, there are operators with no respect for the band plan. I have personally worked the Space Shuttle on several occasions, however, on one occasion, a group of operators would not move off of the satellite sub-band portion of the VHF band and I had to abandon my attempt to talk with the hams on board the Shuttle. Please do not allow the degradation of the VHF/UHF bands to happen to the Amateur Radio HF bands.

A) I agree with the combination of the Novice, Technician class licenses. This new class of license should be renamed to Communicator. I also agree with the no code requirement for this class of license (Communicator) to those Amateur Radio frequencies above 30 MHz.

B) It is my opinion the Technician Plus should remain and carry the present 5 WPM Morse code requirement for access to those Amateur Radio frequencies below 30 MHz. The General, Advanced and Extra Class license structure ought to remain intact for the telegraphy portion of the licensing requirement.

C) Under the Discussion portion of this docket, in Part 12, regarding the disposition of the Novice bands, they should remain as they are or expanded as the FCC desires, but should be renamed to Technician Plus to reflect this class of license. The power limitation should remain at 200 watts, but be allowed as the present Novice class is to operate telegraphy on the 80, 40, 15, and 10 meter bands.

III. I agree with Section B of the Discussion portion regarding preparation

of the examination elements. I believe that a volunteer examiner (VE) should be able to prepare and administer exams for which he or she has received credit.

IV. I agree with Section D of the Discussion portion regarding privatization of certain enforcement procedures. There isn't enough enforcement of the rules on the Amateur Bands and I would like to see a clean up of the malicious interference, lack of respect for the band plan and foul language that is prevalent. Particularly on the VHF/UHF bands.

V. I would like to comment about Section E of the Discussion portion regarding Telegraphy Examination Requirement. My opinion is that the telegraphy requirement is not an insurmountable barrier for an individual with normal intelligence or without handicap to overcome. It is mentioned within part 20 and I will paraphrase, that one of the purposes of the Amateur Radio Service is to advance both communication and technical skills and the expansion of the existing reservoir within the Amateur Radio service of trained operators, technicians and electronics experts. There already is an entry point into Amateur Radio and that being the class of license that I would like to see formed and I have already mentioned - Communicator. People interested enough in the service will take the time to learn the Morse code. Please do not cheapen the Amateur Radio Service by lowering the testing standards.

The telegraphy requirement should remain in its current form. I believe that VE's should allow either fill-in-the-blank questions, although not a very good form of code proficiency or one minute of solid copy out of five minutes of code sent. This should be left up to the VEC in charge.

V. I applaud the FCC for rejecting sections 29 and 30 of Section G entitled Disposition of Rule Making Petitions.

Thank you for your time and consideration.