

To: The Secretary
Federal Communications Commission
Washington, DC 20554

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

Before the
Federal Communications Commission

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

Summary; Three classes of licenses and one level of code proficiency at 5 words per minute (wpm) are the two most essential components that the FCC should include in their final proposal for "Restructuring of the Amateur Radio Service." These provisions, if adopted, would have the following immediate effect of; (a) Reducing the work load of the FCC--three licenses in place of six, (b) Streamlining the amateur testing program relevant to current and future technology and (c) Facilitation the growth of the amateur service.

Provision 1. Number of license classes:

In my view the FCC's proposal does not go far enough toward streamlining and modernizing amateur radio. The proposed four classes of licenses are simply too many. I suggest you eliminate the following classes--Novice, Tech Plus, and Advanced and retain the following classes--Technician, General, and Extra. Current Novice and Technician Plus licensees should be "grandfathered" to General class operators and the current Advanced class licensees should be "grandfathered" as Extra class operators.

The Technician class should become the sole entry class license. It would grant VHF privileges and entail a basic written test, but no Morse requirement. The General class license would grant full HF privileges and would entail a written test and a 5 wpm morse code requirement. The Extra class license would entail a comprehensive written examination and signify superior achievement and comprehensive knowledge of all areas of theory and amateur practice--however, it would not require an additional level of Morse code proficiency. Frequency allocations can continue to reflect differences in the license classes in an appropriate fashion as they currently do. This system would put the US in alignment with other CEPT countries who, at 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 written testing on various aspects of current and developing technology. Today, Morse code is merely one of many modes of communication and there is no reason to single it out as particularly significant or important. A single 5 wpm Morse test will also remove the necessity of processing and issuing waivers for the handicapped.

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Eventually, all Morse testing should be eliminated consistent with US obligations under International treaties.

These suggestions, if adopted, would simplify the licensing processes and ensure, into the twenty-first century, the continuing history of amateur radio service to the country.

Respectfully submitted,



Ken Myers Call Sign KA7QFK
22701 N. Black Canyon Hwy C-22
Phoenix, Arizona 85027

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