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FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW ROOM 222
WASHINGTON, CD 20554
ATTN:MAGALIE ROMAN SALAS
COMMISSION SECRETARY

IN RE: PROPOSED RULEMAKING
\ RM9148/RM9150/RM9196

DEAR COMMISSIONERS:

As much as has been published in regard to the proposals of the FCC and the American Radio Relay League regarding changing the setup of the Amateur Service, please accept my comments as follows. I have never responded to any Federal Proposals, and the format may be a bit different than required, so I apologize for that.

LICENSE CLASSES

First of all, I agree that the Novice class should be phased out inasmuch as the numbers show very few entering the service at that level. But to say that the current Novice licensees qualify for the telegraphy requirements of ANY license class is wrong. Novices passed the minimum telegraphy requirement, and a Novice theory test. They were not required to pass a "technical" theory test of any type as the No-code Technicians are. In your own proposal, you discuss the :technical aspects of the service, and yet you want to upgrade the Novice class with no mention of the technician class. Current Novices have few privileges above 50 mhz. The Technician class licensees do have the technical theory tests passed, and could possibly be called technical experts, however I admit, many have passed their entry test by memorization of Q & A .

The Technician Plus licensee, which I am, entered as a no code technician in most cases, and has later taken the 5 wpm telegraphy test in order to upgrade. This shows the desire to advance in this service, however realizing with the 5 wpm they are only gaining the same privileges that a novice class licensee has. The desire to attain the 13 wpm plateau seems to be more present in techs that I have talked to than Novices, of which I only know a few anyway.

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With this in mind, it seems that if you wish to have technical experts in the service, then the current ARRL proposal in front of you makes sense.

CHANGE THE TECH PLUS CLASS PRIVILEGES TO GENERAL CLASS PRIVILEGES ON PHONE ONLY AND THE SAME CW PRIVILEGES AS THE CURRENT NOVICE AND TECH PLUS, AND CHANGE THE NOVICE CLASS PRIVILEGES TO THE TECHNICIAN CLASS BANDS ON PHONE INCLUDING THE TECHNICAL THEORY TEST, AND THE SAME CW PRIVILEGES AS THEY NOW HAVE .

Some may argue the upgrade in privileges, but again, in your own words, "technical expertise" has been attained by those who have taken a "technical theory test". Techs SHOULD be given more privileges than novices, not the opposite.

I agree with the Novice phase out, and all entry level being technician, but please don't downgrade the technician plus into that same class.

VOLUNTEER EXAMINERS

In regard to the VE and FCC "burden", under the current system, testing at any entry level requires processing. In the case of tech to tech plus, there is additonal processing, as there is with any upgrade testing. The FCC database does not change however, as you suggest. The number of amateurs remains the same, it's just more paperwork under the current system. If the license classes are set as I discussed earlier, and the new telegraphy requirement became 8-10 wpm for ANY upgrade, it seems to me that the processing of applications becomes less of a burden because it is only a one time telegraphy test for the new general class. Further upgrades would be "technical" theory tests for the class being attempted.

Using this theory, the Volunteer Examiners, the Volunteer Examiner Coordinator, and the FCC all have a reduced paperwork burden. Unfortunately, the long discussed and long argued topic of telegraphy is involved here. No matter what gets done, it does revolve around addressing the telegraphy requirements whether we want to or not.

What is the future of the service if all the older amateurs die off, and we have only technician class licensees whose only "expertise" came from memorizing question and answers in a book. I would like to see the testing requirements changed using a basis of knowledge in the field. Do not publish Q & A, just set the areas of testing material, and make sure someone knows it before being granted the privilege of a higher class. **Learning** creates experts, not memorization. Those willing to learn.then, should not be burdened with additional telegraphy requirements because most are not using it anyway. Voice, digital, data, etc are the future. If we have a basic knowledge of CW, we can do with it what we want, but CW is not used by "the experts".

Any decrease therefore in higher class licensees would also mean a decrease in VE's to administer tests. This can only result in burdening the FCC to return to testing at FCC offices which I can be sure you don't need.

RACES AND ENFORCEMENT

No comments at this time

TELEGRAPHY REQUIREMENTS

Without a doubt, Morse Code IS Ham Radio; it always has been. However its declining use must be recognized. As previously mentioned, there are many modern modes of communication in use and it looks like these are a big part of our future. We are not working Oscar or EME with CW, nor are we sending packets, talking with astronauts, or space stations with Morse.

As I discussed earlier, some "No-Coders" (as the older hams are calling us)are obtaining licenses simply for the ability to call home and tell someone they're on the way. This is fine with me, but it seems like those with desire to upgrade, pass a telegraphy test, and begin to learn more technical aspects of the service, should not be burdened with more than one speed requirement . A single CW requirement for all should be considered.

Again, older hams becoming Silent Keys is a giant loss. We will have no more "elmers", and no more technical people to help us upgrade if we desire. Other upgrades as I mentioned should involve theory testing only, but without the questions and answers being published in advance for periods of 5 years. Doing this will create experts because we are learning.

Those who enjoy CW will always be using it, but the other modes will enhance the future of experimentation, advance the art, and create international goodwill as our basic principles state we should do.

DISABILITY CODE TESTING

In recognizing the federal laws regarding rights of the disabled, and reading about telegraphy waivers for the disabled, I disagree with the current regulations. They make no sense at all. I have sympathy for the disabled, (my spouse is disabled) however let's be realistic. A person without hearing can't listen to his radio whether voice or sounds are being emitted. A person without the use of his/her hands or fingers, can listen, but how do they respond in code ? Yes, there are devices to overcome these in some cases, but the average person is not going to spend thousands of dollars to get these devices. Persons looking for a waiver of any code requirement based on disability need more than a note from their doctor that they can't hear the test. Rather than get into the "rights of privacy", I feel amateur radio is one area where if you can't take the test because of disability then you can't upgrade. Chances are you aren't going to use the mode anyway because you can't hear, or can't send. Along with a waiver request, VE's should be given access to an entire medical history of the disability in the person if necessary, or if they feel there is reason to check further into the person present for the test session.

I have no idea what types of requests for waivers are being submitted, but I can't think of anything that makes me say ok let them upgrade without the code because their doctor says so.

FINAL COMMENTS

Both the Federal Communications Commission and the American Radio Relay League have good points and bad points in each of their respective proposals. No matter what changes are made, or what portions are combined from each proposal, it will cause arguments somewhere.
Your task is not an easy one. I sincerely hope, however that you recognize the ARRL proposal as the best solution to reducing the number of classes, recognizing the Tech plus class upgrade to general based on "technical expertise" as discussed earlier, however making fixed telegraphy speed for all classes, and leaving the VE program like it is.

I sincerely thank the Commission for this chance to respond to the proposals and I wish you the best of luck in whatever decision is made regarding same.

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