

Before the
Federal Communications Commission
Washington, D.C. 20554
In the Matter of

) WT Docket No. 98-143
)
) RM-9148
) RM-9150
) RM-9196
)

COMMENTS OF Randall Zabel

I am an amateur radio operator. This is my comment to NPRM 98-143.

NPRM, WT Docket No. 98-143, Section E, Telegraphy Examination Requirements, paragraphs 19 to 25.

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.
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.

