



I hear a goodly number of Tech Plus operators in this segment. I am sure there would be a similarly greater usage of the HF SSB voice operation in other band segments by Tech Plus if they were available for Tech Plus use.

The proposed provisions for the Novice Licensee as proposed by the Commission would appear to be an equitable action.

The proposed full band use of the Novice for CW will most likely enrage some of the dedicated CW operators, however, this relaxation of the rules is in concert with the Commission's objective of simplifying the Rules Enforcement. No operating frequency restraints therefore no violations.

The power limitation for the Novice Licensee is for the most part academic. In practice, most of the apparatus that is currently sold for use in the Amateur Service has output levels in the 100 watt power range.

For increased power additional Power amplifying apparatus is necessary. My experience in operating the Novice CW frequencies that the powers are what the bare foot radio provides. In some cases the power is much less than the 100 watts.

The Advanced Class and the Extra Class licensees should be combined. The Extra Class license being eliminated. The privileges of the Advanced Class should be opened to the General Class licensee and the privileges of the Advanced Classes should be the same as the current Extra Class.

The Novice class can be phased out without detriment to the Amateur Service.

The Technician Plus License licensed prior to 21 March 1987 can be upgraded to General if the Code requirements for all licenses is reduced to 5 WPM. Licensees obtaining the license subsequent to that date could be offered the opportunity to pass the required additional Element to qualify for the General Class license or be changed to a Technician Licensee with no HF privileges. Thus, the Tech Plus License could be eliminated.

#### B. Volunteer Examiner Opportunities.

I concur with the proposed changes in the rules as stated in Paragraph B. Residing in an Urban area examiners are not a major issue in my location. However, It is easily seen that in a more Rural environment finding the required qualified examiner could be a serious problem.

#### C. RACES Station Licenses.

The services rendered by the RACES service can be adequately provided by the Amateur Service at large. If a group of Civic Minded individuals desired to form a specialized group there is nothing to stop them, The 10 10 Club is such a group dedicated to the use and preservation of the Ten Meter Band.

I also concur that there is little reason to perpetuate this special license.

#### D. Privatization of Certain Enforcement Procedures

The use of volunteers for Malicious Interference Complaints is most likely the only way in which these complaints can be resolved in a reasonable time frame. It is unlikely that the Commission could staff a group like this. As a Tax Payer I am not sure that the money would be well spent in this type of operation.

The proposal has merit and in my opinion should be pursued.

#### E. Telegraphy Examination Requirements.

It is interesting to note that virtually all Commercial and Military Services have ceased to use CW (Morse Code) for primary communications. I believe it is significant that other more modern and more efficient modes of communication have supplanted CW.

Many other Countries have reduced the code speed requirement to 5 words per minute. The Commission has found it acceptable to permit Amateur Radio Operators licensed in these Countries to operate in the General Class Band assignments while they are operating under a reciprocal licensing agreement.

As of this time International agreement requires the demonstration of the ability to send and receive Morse Code signals. There is no reason to require more than one code speed for qualification for an Amateur Radio Service license. Further, there is little reason to require more than a minimal proficiency as there is little need for CW communication, the need having been supplanted by more modern and efficient modes.

I would recommend that there be one qualifying code speed for all license classes. There is no reason that would justify a speed greater than 5 words per minute that I can conceive.

The ARRL, with all due respect, has not always represented the majority of amateurs or their best interests. They have acted in good faith but have erred. The implementation of Incentive Licensing stunted the growth of the Amateur Service for many years.

I strongly urge the Commission to temper the recommendation of the inane multi level code speed requirements with the actions of other Commercial and Military Services and Countries with regards to CW requirements.

It would be prudent, in my opinion, for the Commission to reduce the requirements to a single 5 wpm requirement for all classes of licensee.

Accommodation of the Disabled has always been a potential area for abuse. I doubt that there is enough of such abuse to warrant any significant action.

Additionally, if the Commission acts to reduce the CW requirement to a 5 WPM requirement, I would think there would be less need for the deceitfully inclined to invoke this accommodation of the rules.

The Code examination should remain multiple choice.

#### F. Written Examinations

I have reviewed a sample of questions that are on the current Written Examination. It was my impression that they cover the areas that would be encountered by any Amateur operating a station in the Amateur Service.

My only comment would be that the questions should remain relevant to the current trends in Communication Technologies being used on the Amateur Bands. Questions relating to Packet, ATV etc. should be included as part of the Exam.

The Amateur Radio Service Examination should reflect the increase in the complexity of technology. The Amateur applicant should be required to show technical prowess more so that manual dexterity in sending and receiving code.

#### G. Disposition of Rule Making Petitions

Item 30, Tech Plus privileges in the 160 and 80 Meter Bands, would have merit if the Commission does not see fit to grant Tech Plus (licensed earlier than 21 March 1987) General Class privileges.

CONCLUSION

It is my opinion that the Commission would be acting in the best interests of the Amateur Radio Service and the Commission if they were to act such that:

1. The number of License Classes were reduced to four or less.
2. The current Novice license class were phased out with no new licences being issued.
3. The required Code proficiency speed for all licenses were reduced to 5 words per minute.
4. The 21 March 1987 and prior Technician Plus class license were upgraded to the General Class license and then the Tech Plus license discontinued.
5. The 22 March 1987 and subsequent Technician Plus class license were upgraded to the General Class license after successfully passing the required additional Elements or be changed to Technician Class with no HF privileges. This class would then be discontinued.
6. The entry class license would be the Technician code less license.
7. Written examinations contain questions relevant to the current state of the art being implemented on the Amateur Bands.
8. RACES licenses were discontinued.
9. VEC test administration rules be eased in accordance to the Commission proposal.

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