I will try to be brief in my comments on NPRM Docket 98-143.

First the positives:

Restructuring the classes to 4 is good. The Novice/Technician classes have become quite confusing and needs to be simplified for administrative as well as implementation aspects.

The increased flexibility in VE's participation is good. The restrictions currently imposed make it simply a matter of memorization to pass an upgrade test. Actual understanding and utilization of theory/rules is not necessary.

The elimination of RACES also makes sense. Again, as in the Novice/Technician issue, this licensing is confusing and can be redundant with ARES.

Improving enforcement is always a valid concern.

Expanding the phone sub-segments on the HF bands is reasonable. Having scanned the CW segments quite a lot lately, the upper portions (Novice) appear not to be utilized. With the popularity in phone, it would make sense to sacrifice some of the CW sub-segment to the phone segment. Of course, this assumes no new developments in the digital signal modes!

Now the negatives:

I believe the present code speeds for elements 1A, 1B and 1C make total sense. If I had to make a change form the 5, 13 and 20 WPM speeds, I would suggest 5, 10 and 15WPM. However, dropping the code speed to 5WPM as the requirement to gain current General Class privileges is excessive. Rather than that, why not expand the current Novice privileges (5WPM) to portions of the HF bands smaller than the General segments. Thus, Class A operators would be permitted within the complete HF band segments, Class B would have only a subsection of each band, Class C would have a smaller segment and Class D would be more restrictive. These levels of testing do not seem to be very restrictive and yet allow some incentive to continually improve the skills of amateur radio operators. If that is not the objective of licensing, then let's just do away with code testing completely, have one test and allow those that pass it the whole segment of each band!

Comments on NPRM in general:

It's always good to re-evaluate one's position occasionally. However, I must question the motives behind the various proposals being suggested in this license-restructuring plan. If the objective of these proposals is to increase the overall number of amateur radio operators in the US or build up the number of ARRL members, then these proposals should work. If the objective of the proposals is to increase the use of the HF bands, than these proposals are a guaranteed failure!

I cite as an example the current Technician-Plus/ Novice classes. While these new classes introduced in the 80's increased the number of amateur radio

operators and increased the usage of the VHF bands, very few of those that were eligible to use a sub-segment of a HF band took advantage of it. I suspect that many of those who obtained an amateur radio operator's license either upgraded or became inactive. My prediction for the simplified licensing is that the same results will occur. There will be a rapid increase in the number of operators, but the utilization of the HF bands will remain at current levels.

Why do I predict this? First, the current attitude of the US society is to be given things without having to earn them (Dumbing-down and laziness). However, unlike the VHF bands where a simple handheld radio is fine, operating on the HF bands requires the planning and installation of a station. This includes the construction of some form of antenna that is not trivial. Most of those operators who are handed a simplified license will not have the incentive to go through the expense or effort of installing these stations. And why should they in the current world of communications (Internet, cellular phones, etc.). Those that do attempt it and have not grasped all the concepts will probably cause a rash of RFI and TVI problems.

If we really want to increase the usage of the HF bands, I suggest a better way of doing that is to increase the number of emission types allowed on the amateur bands. For amateur radio to remain viable in the current communication age, techniques such as spread spectrum, compandoring, and higher baud rates of digital modes need to be more readily available in the HF bands. This will create the interest needed to attract new operators to the HF bands. Simplifying the licensing structure alone will not accomplish this increase in utilization. While easing the licensing structure will aid in this, the oversimplification of the license would work in the reverse.

From my personal experience, the incentive licensing has done a great job! I have obtained the ARRL DX Honor Roll on phone while holding my Advanced class license. I am now in the process of trying to upgrade to Extra to do the same thing on CW before the solar cycle really takes off! Since all the DX are down in the Extra class CW portion, I need the upgrade. Whereas two years ago, my code speed was barely above 10WPM, I can now comfortably copy 25WPM. Additionally, because of the interest in DX, I have established antennae for each of the HF bands but 30M. As soon as I figure out how I can fit one more antenna on this lot, I'll put one on that band, too! Through all this, I have learned how to design and construct trapped dipoles, phase vertical arrays, repair solid state/tube rigs (Yaesu FT101), and design, build and repair amplifiers. I have operated SSTV, RTTY and HF packet and have the itch to start satellite contacts.

Why? Because I had to work for my license, learn the theory and procedures. My license is something of which I am proud and amateur radio continues to offer new horizons to me. Would I have done this if the license were handed to me? I probably would not.

Thank you for allowing us to comment and your time in reading this.

Respectfully your,
Martin Schick
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