

Comments on FCC NPRM WTB Docket 98-143
Michael D. Rhew - KC8DBP
Volunteer Examiner

To whom it may concern:

After having read both the original NPRM and the later errata, I must say that it has been a very long time since any document confused me as much as these. Since there appear to be many self-contradictions, and possibly errors in the document, I will not attempt to address specific sections in the document. I will comment in a freeform manner, on concepts rather than specifics.

As a volunteer examiner, I think reducing unnecessary paper work is a good idea, and reducing unnecessary testing is also a good idea. I do not believe that combining the current novice and technician (2 and 3a) written test into a single test of 65 questions will reduce the workload on volunteer examiners. I have administered novice and technician written tests to some teenagers and adolescents that have taken a club sponsored class, and watched them struggle to complete one of these in an hour and a half. Combining these tests without any change in content will be an insurmountable obstacle for many young would-be HAM operators. I believe that this large test size will increase the number of failures and re-takes, thereby increasing greatly the workload on the volunteer examiners and the volunteer examiner coordinators. I also believe that if the entry-level speed requirement for CW is raised above 5 WPM the same problem will be manifested. The only foreseeable effect of these changes is a great reduction in the number of people passing their license examination, which will certainly reduce the workload at the FCC, but it will increase the volunteer examiner system workload, and damage the Amateur Radio Service.

I believe that a good course of action is to make the entry level license a VHF and up type of license, with NO CW requirement (testing), and no HF related test questions. I also believe that these license holders should be allowed to use a segment of the HF frequency allocation for CW ONLY at low power levels. This will provide a motivation and practice zone for developing their skills in CW. Currently there is not much CW

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activity in the VHF frequencies, and in order to develop CW skills some HF Frequencies are needed by these licensees.

The question of CW testing as a requirement for any license class is a very emotional issue for many people. The fact is that if a person does not know CW they can not use the mode, so testing is somewhat a moot point, unless voice privileges are tied to the CW test. That brings the International Treaty requirements into view. The idea is to limit world wide coverage frequencies to those who are most capable of communicating in adverse conditions. However, the VHF users currently have worldwide coverage by means of digital satellite modes, using packet store and forward BBS type communications, much like the Internet and computers. Therefore the CW requirement is rendered obsolete. I believe the CW mode is a valuable mode, and should be afforded some protection, but I do not believe it should be a prerequisite for a VOICE mode license. If CW continues to be used as a filter to keep the masses out of the hobby, we are creating an elitist, snobbish, atmosphere when in fact we are supposed to be Good-Will-Ambassadors to the world. I believe that until the International Treaty is changed, we should require only the MINIMUM CW speed as a prerequisite for gaining full HF frequency and operating mode privileges, and allow those who demonstrate higher speed CW capability to use higher power levels. A problem we have at present is that too many people are using maximum power to brute force their way in when the bands are crowded. Reducing the power levels will make the bands less crowded even if more people are using the bands simultaneously.

I am opposed to requiring a one-minute straight-copy exam for the CW test, since it is not necessary for conversational communication, and adequate understanding. Solid copy only makes sense in the light of CODED SIGNALS, which are illegal for amateur use.

Reducing the number of license classes is one method of reducing the amount of paperwork required. I am not opposed to reducing the number of license classes, but the

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people who have already earned certain privileges should not lose those privileges in the process of eliminating their class of license. To say to these people that you will lose privileges you have already earned if you do not upgrade to the next class of license is to rob them of something they worked hard to obtain. Some of these people may not have the ability to upgrade to the next class of license. In a time when the rights of the Disabled are in the forefront of the public view, and we have federal laws to prevent discrimination against them, it is not a good idea to take away hard earned privileges.

As a volunteer examiner, I support the change to allow an Advanced License class VE to test an applicant for the General license. I propose taking this one step further, to allow an Advanced License class VE to test an applicant for the advanced license. Unless the CW test speed requirement is changed the Advanced and General class license exams use the same speed, so the examiner is testing the applicant at the same level at which the examiner tested. Extend this concept to the written exam also and allow the Advanced License class VE to test an applicant for the Advanced License.

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