

Dear FCC,

As a licensed amateur for nearly 50 years as well as a Volunteer Examiner, I wish to comment on your proposal to streamline amateur rules.

The four classes of license as proposed in NRPM 98-143 may be more than needed if some answer to the Technician license dilemma can be found. While I'm very reluctant to agree to the much discussed change in the Morse code requirements, changes in technology seem to be reducing the need for cw.

By reducing the Morse code requirement to 5 wpm for the General class license, it would seem possible only three levels of license are required, i.e., General, Advanced and Extra with the Novice, Technician, TechnicianPlus license being eliminated. Granting General class privileges to the present Novice, Technician and TechnicianPlus class licensees certainly would streamline the license process. However, the granting of a waiver of present requirements in the case of the Novice and Technician seems difficult to justify only in the name of streamlining the license process.

There is also the issue regarding the Technician class license who has not completed element 1(A). It may not be appropriate to grant any privileges below 30 mhz in keeping with the International Radio Rules. Unfortunately, this fact would seem to argue for keeping the Technician class with current frequency allocations.

I would recommend that the Advanced license require an increased Morse code requirement of at least 12 wpm. Both the 5 wpm and the 12 wpm code examination should be based on one minute of solid copy. As the code speed requirement is lowered a corresponding increase in examination technical content should be required. In addition to increased technical content reflecting the current state of electronics and digital techniques, I would also recommend increased operating requirements be included especially concerning techniques and procedures for emergency communications.

The present system of a uniform data base of multiple choice question and answers should be maintained in order to keep the examinations uniform regardless of the test location. After examining the proposed changes to Section 97.501, I recommend the General class license be increased to 50 questions with the additional questions involving topics 1, 2, 3, and 9. Likewise, I recommend the Extra class license examination be increased to 50 questions to reflect the increased technical and operating requirements. The present Morse code requirement of 13 wpm and 20 wpm represent a challenge to most candidates for an upgrade in amateur license and as such, requires a significant effort which has helped to maintain the "value" of an amateur license. I believe that lowering the code requirements requires that the examination for each license reflect a more comprehensive and increased technical requirement to preserve the "value" of the amateur license.

As an active VE, I recommend that the physician's certification

provision in Section 97.505 be removed from the rules.

There is a need for continued improvement in enforcement of the amateur rules, especially on some of the amateur operating frequencies. Recently, there seems to be some improvement noted as the result of the FCC reorganization. The amateur community has the ability to organize the monitoring required for enforcement of rule violation provided there are clear standards of what constitutes meaningful evidence of a violation that could be used for enforcement proceedings. I believe continued progress can be made in enforcement through an organized cooperative effort by the FCC and the amateur community similar to the volunteer examination process.