

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of) WT Docket No. 98-143
)
1998 Biennial Regulatory Review --) RM-9148
Amendment of Part 97 of the Commission's) RM-9150
Amateur Radio Service Rules.)
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)

COMMENTS OF KENNETH M. BOURNE

I have been an FCC-licensed amateur radio operator since November 30, 1956, and currently hold an Extra Class license, with the call sign of W6HK. During all of those 42 years, I have been a certified participant in the Radio Amateur Civil Emergency Service (RACES). My experience includes serving as the DuPage County (Illinois) RACES Radio Officer, a regional State of Illinois RACES Radio Officer, the Orange County (California) RACES Chief Radio Officer, and (currently) the Deputy State ACS Officer, California Governor's Office of Emergency Services. Professionally, I am an electronics engineer, as a result of developing an initial interest in electronics while a teen-age amateur radio operator in the 1950s. The following comments are my own, and not necessarily the opinion of the agencies that I have served or am serving.

NPRM, WT Docket No. 98-143, Section A, Number of License Classes, paragraphs 11 to 13.

1. I agree with the FCC's assessment that the no-code Technician Class operator license has replaced the Novice Class operator license as the entry-level license class of choice. However, I do not agree that the Novice Class operator license should be phased out. Rather, the Novice Class operator license should be changed from a CW-only HF license (with 10-meter voice privileges) and VHF/UHF license (with voice privileges) to a digital-only HF license.

2. Currently, the Novice Class operator license does not attract newcomers--especially young people who are currently attracted away from amateur radio by computer communications via the Internet. Historically, the Novice Class has been a gateway to young people for entering HF amateur radio communications, and to experience and appreciate the excitement of HF propagation. Nationwide and worldwide communications via radio, rather than by telephone computer connections, introduces the Novice to studies of propagation. This early fascination with this "mysterious" aspect of radio-electronics leads towards other discoveries in RF technology, eventually leading many young people towards an education and career in RF engineering or radio communications. Considering the current shortage of RF engineers in the United States, this would be good not only for our nation's youth but also for our nation itself.

3. Accordingly, I propose that the Commission retain the basic Novice examination on rules and regulations and basic radio theory, but replace the Morse code exam with an exam on digital communications operations and techniques.

4. Novice Class operators should be allowed to operate all digital modes (such as PACTOR, AMTOR, GTOR, RTTY, ASCII, packet, etc.), including Morse code, in the

existing Novice HF band segments. The Novice voice segments on the 10-meter and 222-MHz and 1.2-GHz bands should be eliminated, in order to provide an added incentive to upgrade.

5. To adhere to the international Radio Regulations (Article S25) that require all amateurs licensed to operate below 30 MHz to demonstrate their ability "to send correctly by hand and to receive correctly by ear, texts in Morse code signals," the examination for all classes with HF privileges should be configured to show that the prospective licensee has the ability to send and receive Morse code either manually (as now, but at 5 words per minute for all classes of license) or via computer. To comply with the "by ear" provision, a receiving test would consist of simply recognizing the signal as Morse code by hearing it, and configuring the computer and digital controller to receive it. This entire code examination should be discontinued upon deletion of this international regulation.

6. The current no-code Technician Class should be retained as simply a Technician Class license, with no HF privileges. The written examination should be enhanced to include the same elements as the General Class examination, including the new element on digital techniques. Upon passing the digital sending/receiving examination described above (manually at 5 words per minute or via computer), the licensee should be upgraded to General Class, with HF privileges. When the international Radio Regulation (Article S25) requiring Morse code capabilities below 30 MHz is abolished, the Technician Class license should be discontinued, and existing licensees should be upgraded to General Class.

7. The current General Class license should be retained, with a new element on digital techniques added to the exam. The Morse code requirements should be reduced to 5 words per minute, with the sending/receiving examination given manually or via computer, as described above (including a manual recognition of Morse code "by ear" when testing with a computer).

8. New Advanced Class licenses should no longer be issued, but existing licenses may be renewed.

9. The Extra Class should be retained as the highest class of license, with a new element on digital techniques added to the exam. The Morse code requirements should be reduced to 5 words per minute, with the sending/receiving examination given manually or via computer, as described above (including a manual recognition of Morse code "by ear" when testing with a computer).

NPRM, WT Docket No. 98-143, Section C, RACES Station Licenses, paragraphs 15 and 16.

10. Rather than phasing out RACES station licenses by not renewing them, I propose that such licenses not only be renewable but also be issued to qualified applicants (civil defense or equivalent government emergency-management agencies). The drop in the current number of licenses is due, in my opinion, to the perception that this is an "obsolete" license because no new licenses are issued.

11. The RACES station license serves an important purpose. A RACES "WC" call sign on the air imparts a certain and needed authority, especially during an emergency, that the frequency is to be used only for communications relating to

that emergency. It is easier to request a clear frequency when the RACES net control uses a RACES station call sign.

12. If the Commission should decide, after all, to phase out RACES station licenses, civil defense organizations currently holding such licenses should be permitted to apply for the same "WC" call sign as a "vanity" call. In this case, "WC" 2x3 call signs should be made available as vanity calls to any civil defense or equivalent government emergency-management organization.

13. Section 97.407(c) and (d) of the Commission's Rules should be modified to permit RACES stations and all amateur stations registered with a civil defense organization (or equivalent government emergency-management agency) that are operating in a RACES net to communicate with any amateur station, upon the decision and direction of the RACES Coordinator, the RACES Radio Officer, or the RACES net control operator. This would allow emergency traffic to be passed between RACES and nonregistered amateur stations, such as Amateur Radio Emergency Service (ARES) stations operating at schools, hospitals, etc.

14. Section 97.407(e)(4) of the Commission's Rules should be modified to eliminate the time restrictions on drills and tests, currently set at 1 hour per week, plus two tests and drills per year not to exceed 72 hours. Such restrictions are no longer necessary, and inhibit radio amateurs who are members of RACES organizations from being adequately trained and practiced. Such restrictions were instituted years ago, when civil defense directors and their employees were permitted to operate under RACES Rules with nothing more than an FCC Restricted Radiotelephone Operator's Permit. They occasionally misused such privileges by using amateur frequencies, under the guise of RACES drills, for agency or personal communications. Subsequently, the Commission changed its RACES Rules, allowing only amateurs to operate during RACES drills and activations--thus making this time restriction moot, unnecessary, and harmful.

15. A statement should be added to Section 97.407 of the Commission's Rules, to allow radio amateurs who are paid employees (such as engineers and technicians) of a civil defense organization or equivalent emergency-management agency to communicate under the RACES Rules, for the purposes of testing RACES equipment, coordinating the installation and repair of RACES equipment, and participating in other RACES communications, including drills, tests, and emergency activations. This provision is necessary, to provide an exception to the Commission's Rules that prohibit amateur radio operators from being monetarily compensated for communicating within the Amateur Radio Service.

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

16. I agree with the Commission's assessment that the role of Morse code in contemporary communications is decreasing.

17. The use of Morse code by radio amateurs should continue to be permitted and possibly even encouraged by exclusive allocations of portions of amateur radio bands. However, a knowledge of Morse code should not be required. I believe there is no longer any public/governmental interest served by a Morse code test.

18. Until the international Radio Regulations, Article S25, are modified, I propose an interim requirement of only a single 5-word-per-minute code test for HF operating privileges for any class of license (Novice, General, and Extra, with the Technician Plus and Advanced Class licenses discontinued).

Alternatively, examinations for HF operating privileges could be configured to show that the applicant has the ability to send and receive Morse code via computer. A receiving test would consist of simply recognizing "by ear" the signal as Morse code, and configuring the computer and digital controller to receive it. Upon deletion of Morse code capabilities in the international Radio Regulations, all code testing requirements should be deleted from the Commission's Amateur Radio Service Rules.

NPRM, WT Docket No. 98-143, Section F, Written Examinations, paragraphs 26 and 27.

19. Examinations could be administered entirely by the VE's computer, equipped with software that randomly selects questions and grades answers, and equipped with a sound system that enables the examinee to recognize the sound of Morse code, while configuring an attached digital controller to send and receive Morse code as well as other forms of digital communications.

20. The above proposal for a sound system for recognizing the sound of Morse code, and configuring the computer system/digital controller to send and receive Morse code, would no longer be required upon discontinuance of the international Radio Regulation, Article S25, requiring proficiency in Morse code for operating privileges below 30 MHz.

Respectfully submitted,

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November 23, 1998