

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 Service rules.	)	RM-9196

COMMENTS OF

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November 22, 1998

I am filing these comments on the FCC's Notice of Proposed Rule Making WT Docket 98-143.

I was first licensed as an amateur radio operator in 1970. Three upgrades and eight years later I made amateur Extra class, the class that I still hold. In the 28 years of my amateur radio career, I have taught amateur radio Morse code and theory classes, enabling over 50 individuals to become licensed and active in amateur radio. By participating as an officer in various amateur radio clubs, I have not only developed my technical skills, but have become active in many public service activities. These service events enabled the public to witness the capabilities of amateur radio. For over ten years, I was an Area Coordinator representing AMSAT, the Amateur Radio Satellite Corporation in the state of Wisconsin. My operating activities include bands from HF through UHF and modes, using voice, cw and various digital systems.

There are many amateur radio operators that want to hold onto the traditions of the past. Certainly I have not been licensed as long as many of them, but 28 years is sure long enough to experience a lot of changes. While there is nothing wrong with tradition, it can not remain the sole basis of amateur radio, unless we want the hobby to deteriorate more than it already has. With this in mind, I would propose the following changes be considered to restructure the amateur radio service. I believe that these changes will promote the growth of our service both in the short and long term.

- **Reduce the number of license classes** Our current system of six license classes is not only confusing to potential new licensees, but also terribly unbalanced in rewards verses effort. Incentive licensing has become more of a fallacy as technology changes the way we can communicate today verses when incentive licensing was established in the 1960's. We only need three license classes to span the entire scope of amateur radio.  
Basic - The same as a Technician is today, a no code license with all of the privileges as today. A more meaningful test for this class would stress operating techniques verses technical abilities.  
General - The entry level license for most of our HF frequencies. A Morse code requirement of 5 words per minute would be required, along with a written test that stresses technical ability. This license would have similar privileges as the general class has today.  
Advanced - This license would be our top level for HF frequencies. A Morse code requirement of 5 words per minute would be required, along with a more technical written exam. This license class would provide the same privileges as the present Extra class license, thus combining the Advanced and Extra classes.

With this structure, current Novices and Tech Plus licensees should be immediately upgraded to General class.

- **Lower the Morse code requirements** As you can see above, I believe that it is time to reduce the requirements for copying Morse code. Since there is always a chance that it will be needed in an emergency, it should remain a requirement for HF operation. By exchanging the higher speed code requirements with a more technical written test, we can also eliminate the fraudulent use of medical waivers. A five word per minute code speed is not insurmountable by anyone.

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- **Combine RACES and ARES** In the event of an emergency or just to assist the public with communications, neither the amateur radio community, nor the general public, wants to have to decide which service should become involved. Especially in emergency situations, time is the key to success. Since RACES stations and operators are much fewer than ARES operators, it is time we just combine the two services into one larger pool of potential volunteers. The basis for RACES stations, in that they can remain active during a national emergency, appears to have outlived its usefulness. By eliminating RACES stations, the costs to maintain the callsign database for these will be gone.
- **Create a simple system for rule enforcement** Perpetual rule violators have not only a remote chance of getting caught, but they have an even slimmer chance of being prosecuted. Most of the opinions on this subject reflect that tolerating the offense is easier than attempting to assist in the conviction. While some of this attitude could be caused by a lack of understanding of how to report and assist the Commission, the majority is because we rarely ever receive Commission intervention. If we have rules and regulations, let's make sure that there is an adequate system in place for enforcement.

In summary, we need fewer license classes. The ones remaining should test for operating techniques in the lower classes and technical ability in the higher ones. For all licenses where we test for code ability, the highest speed should be changed to 5 words per minute. Eliminate the RACES service. Provide realistic systems of rules enforcement.

Thank you for the opportunity to voice my suggestions on enhancing the amateur radio service.

Sincerely,

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