

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of	)	
1998 Biennial Regulatory Review --	)	WT Docket 98-143
Amendment of Part 97 of the Commission's	)	RM-9148
Amateur Service rules	)	RM-9150
	)	RM-9196

To: Magalie Roman Salas, Office of the Secretary  
 Federal Communications Commission  
 The Portals  
 445 Twelfth St., S.W.  
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**COMMENTS OF QCWA MARCONI CHAPTER 138**

**I. Introduction**

We the members of QCWA Marconi Chapter 138 file these comments in the FCC's Notice of Proposed Rulemaking WT Docket No. 98-143. In general, we agree with most of the proposals put forth by the Commission and agree that there is considerable overlap between the Novice and the Technician Plus license classes. However, rather than eliminating these two classes as the Commission proposes, we recommend that the two classes be combined into a single class intermediate between the no code Technician Class and the General Class.

We, the undersigned, are all members of the National Quarter Century Wireless Association and also members of the local Marconi Chapter #138. We were all first licensed as radio amateurs more than 25 years ago and currently hold an amateur license of General, Advanced, or Extra class. Many of us entered amateur radio through the Novice Class license and have upgraded to our present license. Our comments are based on three basic premises that we feel are important to amateur radio licensing:

1. The entry-level license should be relatively easy to obtain. We feel that the current Technician license meets that need.
2. Incentive licensing has encouraged amateurs to advance their technical knowledge in order to obtain the higher classes of license with the enhanced operating privileges and call letter assignments. The current steps between the different license classes appear to be about the right size to be challenging but not overwhelming.

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3. Radio Amateurs express a sense of pride in achieving the current operating privileges associated with their current class of license. The popularity of operating awards attests to the importance that many amateurs place on reaching for and achieving goals.

## **II. Number of Amateur License Classes**

We propose that there be five classes of amateur radio licenses: Technician (no code), Basic (combined Technician Plus and Novice), General, Advanced, and Extra. Each higher class should have enhanced operating privileges (and call letter assignments) compared to the lower class. This many classes are needed if we maintain easy entry, moderate step size between classes (to encourage upgrading), and a particularly challenging top class.

## **III. Importance and Disposition of the Novice Class**

We agree with the Commission's proposal that there is considerable overlap between the Technician Plus and the Novice Class licenses. We feel that the Commission's proposal to eliminate these two classes is unrealistic insofar as it leaves too large a step between the Technician and the General Class license. The fact that the Commission proposes that current Novice holders be allowed to renew their licenses and that Technicians be allowed to pass the 5 WPM code test doesn't really eliminate these two classes. We feel that a neater solution is to combine these two classes into a single class with a new name (we suggest the name "Basic"). All current Technician Plus and Novice holders would be grandfathered into this new Basic Class. The Basic license holder would have all of the VHF/UHF privileges of the Technician plus limited HF privileges with a 200 watt power limit. The simplest HF operating privileges could be the current Novice assignments. However, we are not averse to giving the Basic license holder additional HF privileges if it can be done without the General Class holders feeling that their privileges are being "diluted". For example, if the phone bands for General and higher are expanded, perhaps the Basic sub-bands could be expanded and additional HF phone privileges given to Basic. We ask the Commission to proceed cautiously with any band reallocations. We do not want a repeat of the incentive licensing of the 1960's whereby many General Class holders felt that significant parts of "their" bands were taken away from them and given to the higher class licensees.

**IV. Enforcement in the Amateur Radio Service**

We feel that enforcement of the Amateur Radio rules in this country is the responsibility of the Commission. Although volunteers can and do point out apparent infractions of the rules, the authority to enforce these rules rests directly with the Commission and we ask you to please meet this responsibility.

**V. Telegraphy Examination Requirements**

While the importance of Morse telegraphy has decreased over the years, it still remains the second most popular amateur communication mode in the high frequency bands because it is effective and many of us find it enjoyable. International regulations require a 5 WPM proficiency to operate on the HF bands and we recommend that this remain the minimum speed required for the Basic Class license.

As a practical matter, most operation on the amateur CW bands is at a higher speed than 5 WPM so we recommend that the speed requirement for General Class privileges remain at around 13 WPM although any speed between 10 and 13 WPM would be satisfactory.

For the top license class (Extra), we recommend maintaining the top speed of 20 WPM. This is a speed that proficient operators usually acquire. We wish to see that the top license grade recognize this proficiency in receiving Morse code as well as a deep knowledge of amateur radio as reflected in the written examination.

We recommend maintaining three levels of code proficiency testing at 5, 10 to 13, and 20 WPM. Furthermore, we recommend that the testing for such proficiency require one minute out of five of perfect copy.

**VI. CONCLUSIONS**

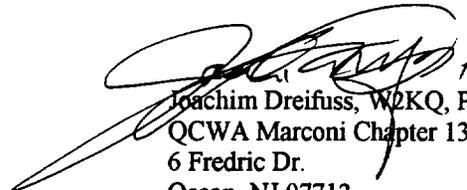
We recommend that the present six classes of amateur license be reduced to five classes by combining the Technician Plus and Novice license into a common class which we have called the Basic Class. The resulting five classes would then be:

Technician	No Code and present exam and privileges
Basic	5 WPM Code and added exam questions regarding HF operation, 200 watt limit
General	10 to 13 WPM Code and current exam questions
Advanced	Current additional exam questions
Extra	20 WPM Code and current exam questions

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This structure preserves the successful incentive licensing structure that has been built over the past years, allows easy entry into amateur radio, and provides a challenging top class license. It also has the advantage of not offending the current amateur radio community. We recommend that you only fix what is broken (overlap of Technician Plus and Novice) and leave the rest of the license structure alone.

Respectfully submitted by



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