

I, Michael Umbarger (KC8EXH), file these comments on 24NOV98 in the FCC's Notice of Proposed Rule Making WT Docket 98-143.

As a current Technician Class licensee, I disagree with the NPRM language that would eliminate the Element 1(a) code test (5 wpm). I concur and support the ARRL proposal that would:

- 1) Reduce the General class code requirement to 5 wpm.
- 2) "Grandfather" all current Novices and Tech Pluses into the General class.

As written, the five-wpm code test would be eliminated which would force any Technician wanting even the most basic HF privileges to pass a 13-wpm test. In my opinion, this would deter the vast majority of Technician class licensees from ever pursuing CW transmitting in the HF band. This would be tragic. CW transmitting remains a cornerstone of amateur radio philosophy and remains a personal goal of mine. However, I fear that this 13-wpm "barrier" would prevent me from ever attaining this goal and expand my contribution to this hobby and national resource that is amateur radio.