

Office of the Secretary
Federal Communications Commission
1919 M. St. NW Rm 222
Washington, DC 20554

IN THE MATTER OF:

1998 Biennial Regulatory Review
Amendment of Part 97 of the Commission's
Amateur Service Rules, WT Docket 98-143

COMMENTS OF:

James Cook
609 Trading Post SE
Albuquerque, NM 87123
e-mail jcook@tvi.cc.nm.us

SUMMARY:

As an Amateur Extra class licensee and an ARRL member, I support the reduction in the number of license classes to four (4). I reluctantly agree with the ARRL proposal to decrease the Morse proficiency requirement for the General class to 5 wpm. I do, however, STRONGLY believe that the demonstrated Morse proficiencies of 12 and 20 wpm should continue to be required for the Advanced and Extra class licenses. I suggest full HF phone access for the Advanced class at 12 wpm. The Extra class license should retain a 20 wpm Morse requirement and offer exclusive access to the lower 25 khz of most HF bands for those who choose rewarded accomplishment in the Morse and digital modes. I do not agree with the current ARRL proposal to allow Technician license access to the General class CW/digital sub-bands.

DISCUSSION:

While I am interested in the Amateur rules being modified to provide greater incentive for prospective Amateurs to enter the service, I am very much concerned that any reductions in meaningful licensing requirements will likely result in a negative and irreversible re-shaping of the Amateur "neighborhood". Let me state that I am in favor of retaining significant and meaningful requirements for Amateur licensing. Although slight modification to entry level requirements might be in order, I do not wish to see the Amateur service downgraded into a service that requires ever less of it's licensees. I personally would rather lose Amateur Radio to land mobile than to see it degraded into a new age Citizens Band or Personal Radio service. Amateur Radio should remain a technical environment.

I understand the Commission's desire to de-emphasize the role of Morse code as a license requirement for Amateur operation below 30 mhz. I believe that for an entry level license (the General), this might be appropriate. I do believe, however, that significant Morse proficiencies should be retained for the higher class licenses. Even in this digital age, Morse remains a universally understood and uniquely efficient and effective means of worldwide communication using simple equipment. I see it as a meaningful license requirement for those interested in HF communications and I certainly see the value in maintaining a pool of operators trained in a mode so uniquely suited to HF. For Morse testing I suggest the elimination of multiple choice examinations and hope to see either Fill in the blank or solid copy for a specified period.

There are proposals that suggest the higher Morse proficiencies should be traded for increased difficulty in the written test elements. If indeed the written tests were real tests, there might exist an argument. But since all of the exact written exam questions and answers are available before the tests are given, these tests are often little more than a formality. With that in mind then, reducing the Morse requirements would generally result in operators less qualified for HF communications. While I am in favor of license candidates demonstrating a significant and measured level of technical competency, I frankly doubt that any real increase in written exam difficulty is likely to occur.

I would like the Commission to consider that one of the main attractions to Amateur Radio has always been that it provides an individual with an environment where learning, accomplishment, reward, and recognition are available. These are values that should not be hastily discarded, as the Amateur "neighborhood" would surely lose its value to the very type of individuals that we hope to attract into the service.

Within Amateur Radio there should be a place for all interests to flourish. For those interested primarily in phone operations, let there be an easier entry path to HF at 5wpm. For those many of us who are interested in Morse and digital operations, please allow a license that displays accomplishment in those modes and rewards the licensee with exclusive sub-bands for their use. Any re-shaping of the license structure or spectrum allocations should continue to provide appropriate Morse/CW sub-bands for the many individuals still interested in that viable mode of HF communication.

I applaud the Commission for its most recent enforcement actions in the Amateur Service. These actions are long overdue and I hope to see ongoing efforts of this type.

TO CONCLUDE:

I support a four (4) level license structure.
I support a 5wpm Morse requirement for an entry class of Amateur Radio HF license (the General Class).

I strongly urge the Commission to retain the higher Morse proficiency requirements of the Advanced and Extra class licenses. I suggest 12 wpm for Advanced, with full HF phone privileges. I suggest retention of the 20 wpm Morse requirement for the Extra class license, which should continue to offer exclusive access to the lower 25 khz of most HF bands for Morse and digital modes of operation. I do not support the ARRL proposal to allow Technician access to the General class CW sub-bands.

I thank the Commission for this opportunity to present my views.

James Cook

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James Cook
Amateur Radio license N5KY
Member, American Radio Relay League
FCC General Radiotelephone Operators License
FCC Second Class Radiotelegraph Operators Certificate