

**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 25, 1998

I file these comments on November 25, 1998 in the FCC_s Notice of Proposed Rulemaking WT Docket 98-143 (hereafter referred to as the FCC_s NPR).

To quote the FCC_s NPR, "...we do not believe that sufficient evidence has been presented to justify altering the current requirements which are in accordance with the basis and purpose of the Amateur Radio Service in the United States." I agree with this FCC statement! In fact, the FCC presents some facts that are used as a basis for justifying some changes. I claim these facts argue for no change.

I am a recently licensed ham (first licensed in 1997 as a Technician, and upgraded to Technician Plus this year with the call sign KC2CRO). Some facts and many suggestions provided by the FCC are inconsistent with my firsthand experience. The FCC states, "Both Technician and

Technician Plus Class licensees predominantly use FM voice and digital packet technologies..._ While as a Technician Class operator I did predominantly use FM voice, now as a Technician Plus Class operator I predominantly use Continuous Wave (CW) and Single Side Band (SSB) communications (while occasionally using HF digital, and FM voice).

In the commissioner's opening remarks, he makes clear that while the biannual regulatory review is intended to streamline FCC operations, it clearly does not apply to Amateur Radio part 97. Therefore, as the FCC commissioner himself has clearly stated there is no legal grounds for change.

The FCC claims that few people are entering into amateur radio via the Novice class license and therefore that class should be eliminated to save money on administration. If so few people are entering Amateur Radio through the Novice Class license, then there will be little or no money saved by its elimination. Therefore, using the data provided by the FCC, there is no financial grounds for change. Additionally, while 961 (New Novice Class licenses in 1997 according to the FCC) is a small number compared to 21,416 (New Technician Class licenses in 1997 according to the FCC), that is 961 people who entered amateur radio who, under the proposed licensing structure, would not have.

The FCC claims that the licensing structure needs to be revised to reflect the contemporary aspects of the hobby. I agree! However, in many of the key areas like required code speed, the

FCC makes no proposal. I am disappointed that the FCC is not properly using its own processes (a Notice of Inquiry, NOI, is appropriate for soliciting input). While I disagree with the reasons the FCC gives for changing part 97, I do support the intentions of the ARRL in there proposal, and also agree with the specifics that they propose. Specifically, I support the ARRL proposal that was prepared October 24, 1998 (essentially a modified version of the ARRL July 1998 Proposal). Among other things, the Board's July plan would eliminate the Novice and Tech Plus license classes. This would raise the bar for entry level HF operations; an unnecessary obstacle in Amateur Radio. To provide entry level HF that can be attained with requirements similar to today, CW privileges should be given to Technicians in the current General CW allocations on 80 through 10 meters. Technicians should be permitted up to 200 W PEP. The proposed ARRL A, B, C, and D license class designations should not be used, instead use Extra, Advanced, General, and Technician.

To summarize, financially, and legally, the FCC fails to make a sufficient argument for any kind of change to the existing Amateur Radio licensing structure as covered in part 97. I do, however, agree with the FCC_s suggestion that the licensing structure needs to be examined and revised, as appropriate, in order to bring the licensing requirements in line with current amateur practices. My position on the specifics of how the licensing structure should be examined is adequately presented in the ARRL proposals (specifically, the October 24, 1998 revision of the ARRL July 1998 proposal).

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