

November 25, 1998

RE: WT 98-143

Dear Commissioners:

The great importance of the restructuring of the amateur service should be obvious by the large number of comments submitted. I feel that the decision to restructure amateur radio licensing is a milestone in the history and the future of amateur radio.

We are faced with emotional arguments on both ends of the argument, change or no change. But, the major argument posed by restructuring is really about nothing other than the infamous Morse code requirement for HF access. All other points the FCC has made seem to have a consensus approval by the amateur radio community.

I would first like to give some personal background:

I am a degreed Electrical Engineer (BSEE), who is working for a famed radio company in the Midwest as a Software Engineer. I absolutely love electronics and radio-- they are the major part of my life. I am an active member of the ARRL. I am 29 years old, which is relatively young for an amateur operator.

I will state for the record that, from high school on, amateur radio was responsible for my choice to become an engineer, and finally to get a job in communications.

However, I am only a Technician Plus operator, originally holding a Technician license from 1986. I hold an unexpired CSCE for the Advanced written. I have personally been unsuccessful at my many attempts to bring up my code speed to pass the 13-WPM code test for the last 12 years. I am close, maybe within two to three months to accomplishing that "goal", but, honestly, I resent being FORCED to learn Morse (something in which I am not interested in) for a hobby by the requirement of law. Morse has kept me off of HF for 12 years, and my father died never advancing past Technician Plus— he was licensed for close to 30 years. I am admittedly biased against the Morse requirements for HF amateur radio access.

In college, being the past president of the Rose-Tech Radio Club at Rose-Hulman Institute of Technology (Terre Haute, IN), I convinced about 10 individuals to pursue Ham Radio Licenses. These people were among the most brilliant engineers and scientists that I have ever met. However, six years later, a database search of all of them shows that none have advanced past Tech Plus. (Including myself!) This disturbs me greatly...

We are currently banning some potential amateur radio operators who can be of TREMENDOUS benefit to amateur radio and to public in general with the Caste system we have established called "Incentive Licensing". Many of us have a lot more to do with our lives than sit in front of a computer or a code tape for months to learn CW at 13-WPM.

I wish to keep these comments relatively brief. Therefore, I would like to show my support for the suggested comments from No-Code International-- without repeating them, and further reference the excellent comments posted November 24, 1998 by Jim Rosenthal WA4STJ about the current Morse requirement.

I am going to state some statistics, gathered from the site <http://www.speroni.com/FCC/SCompare.html>. Although this site is derived from FCC data, I am only inferring enough accuracy to show trends.

At 1/1997 there were:

Novice: 66,551 Technician: 174,924 Tech Plus: 139,608 General: 116,629 Advanced: 107,024 Extra: 73,737

At 1/1998 there were:

Novice: 60,125 Technician: 186,458 Tech Plus: 135,737 General: 112,977 Advanced: 104,509 Extra: 74,274

Percent Change:

Novice: -10.6% Technician: +6.2% Tech Plus: -2.9% General: -3.2% Advanced: -2.4% Extra: +0.7%  
-- OVERALL: - 0.6%

Overall, if the goal of the amateur radio service is to benefit the public, and to keep somewhat consistent with the size of the general population in the US, the current structure is FAILING.

In 1/1998 382,320 hams had 5-WPM or less proficiency, where 291,760 has 13-WPM, and the remaining 74,274 have 20-WPM proficiency.

This implies that 32.2% of hams have 13-WPM proficiency, 11.0% are 20-WPM proficient (43.2% combined have at least 13 WPM Proficiency), 56.7% have no proficiency or have 5-WPM proficiency. The majority of amateur operators are represented by the three lowest license classes, and have low speed or no Morse proficiency!

Keeping things as they are only benefits a few. Amateur Operators always claim that Amateur Radio is an open, accessible hobby-- however, the numbers show that a priceless amount of spectrum has been claimed by an elite and select few. I hope the FCC recognizes this and does not continue this trend.

Overall the 674,080 hams in the US represent ONLY A FRACTION of a percent of the general population. I personally would like to see the ham population expand. Public benefit of this, and benefit to the hobby in general would far outweigh any risk of abusive, unruly operators. The technical complexity and relatively high cost of ham radio equipment would prevent a demise of the bands, and prove any necessary "dedication" to the hobby.

From the data, I would propose the following:

Three license classes. I favor the "Class C", "Class B", and "Class A" notation because it eliminates any caste or label associated with "dedication" to the hobby.

Class C: Like the No-Code Technician. With self-testing CW HF access as proposed by the ARRL board in October, 1998.

Class B: Like Current Tech Plus, and General licenses, 5-WPM code required. (Novice to be grand-fathered into this group)

Additional written exam questions to prove knowledge of HF required.

Class A: Like the Current Advanced and Extra Licenses, 5-WPM code required.

Additional test, like the complexity of the current Advanced test required.

(My suggestion for the combination of Advanced and Extra is due to the fact that the Extra license test is a relatively easy technical test, and also that only 11% of the ham population is an Extra, only a little more than the Novice class at 8.9%.)

As soon as the international requirements for Morse are removed, the FCC should remove the requirements as well.

I could settle for the ARRL's October board decision/petition expect for the following two points:

- (1) I think the 12-WPM test should be ELIMINATED, and only a 5-WPM test be allowed.
- (2) The elimination of Multiple Choice answers on code tests is inconsistent with the written tests, and is a ploy to increase the difficulty of the remaining code tests. (Many ARRL VEC's use multiple choice CW tests currently!)
- (3) The paperwork reduction (hence, cost reduction) to the FCC (and VECs) would justify a reduction to three classes. I'd recommend combining Extra and Advanced Classes in this case.
- (4) I also suggest that questions about telegraphy be added to all technical tests, as CW is a useful mode that will be used by amateurs in the future. This makes the CW requirement consistent with testing requirements already in place for other modes.

Those who propose continuation of manual Morse copying requirements generally do so because of the following reasons:

- (1) They had to do it, and it was hard, so should everyone else.
- (2) It will keep the riff-raff out of ham radio.
- (3) Morse and CW is and will be an, or the, most important mode in the future of (ham) radio.
- (4) It is the most useful mode for emergency communications.
- (5) It builds character, and shows "dedication" to the hobby.
- (6) The bands are too crowded—I'll have a harder time because of this.

My rebuttal to these "common Morse requirement retention reasons" is as follows:

- (1) Is a discriminatory and irrational reason, the FCC should ignore all comments using this rationale.
- (2) Has not been proven to make a difference in the real world. The riff-raff seems to be license class independent based upon real cases. (And in reality this is a generous statement.)
- (3) I disagree, and already as stated in the FCC docket, the Morse equipment is being replaced commercially with more reliable (and much faster) satellite data equipment, and other technologies.
- (4) Because there will be a place for the simplicity of CW always, no one has suggested to ban this mode! From my understanding and readings about actual emergencies, most of the traffic passed during an emergency is done via voice anyway.
- (5) It actually only proves that you can copy Morse at a high rate. I personally prefer to show my dedication by building a state-of-the-art receiver, designing antennas, etc.
- (6) The amateur radio spectrum is a shared resource, and is provided for public use.

To date, I personally have not seen a good technical or operational reason for retention of Morse testing requirements in the ham radio service.

A FEW ADDITIONAL COMMENTS:

Eliminating RACES licenses would be a burden lifted for the FCC. I personally believe that every amateur radio station is a potential emergency relief station. This fact is an important justification for the amateur radio service. Some of the comments seem to imply that ARES should be the “official” emergency group when RACES disappear. I think any organization that has good intent should be able to act as an emergency station group. Since the ARRL only represents a fraction of the ham radio population, I have to comment that it would be against public interest to allow the ARES to be the only emergency group as a replacement for RACES.

Also, combining all the tests into one large 65-question test for the entry-level Technician test I fear would be too overwhelming to some younger individuals, and others who may not have a technical background. I would recommend that a this test be limited to 50 questions only. This should still be an adequate number to cover the diversity of the license class.

IN CONCLUSION, I hope the FCC relies on the facts and has the fortitude to make the correct decision about the direction of Amateur Radio (particularly with reference to the Morse requirement) in the future by utilizing the facts, not pressure, from organizations such as the ARRL. The statistics show that currently amateur radio is a stagnant service, and much benefit can be gained by simplifying the licensing structure, not only for the FCC, but also for the general public which amateur radio is supposed to serve. The current licensing structure was designed to limit access to ham radio, not to provide a “reward for dedication” as many have stated.

I think that amateur radio should be a tool (i.e. learn by USING, not STUDYING FOR) for the enhancement of technical and radio knowledge, and making the exams more difficult than commercial licenses is counterproductive. Since Morse proficiency is not important anymore in the commercial world, it isn't important in the radio world either—implying that its importance to ham radio is minimal. I suspect that the FCC has this notion already, and I personally hope that sound rationale is used in restructuring our licenses.

Respectfully Submitted,

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