

Gentlemen:

A. Number of License Classes

I concur with the proposal to eliminate the Novice and Technician amateur license. With the elimination of the Novice license it would be appropriate to delete the frequency limitation for current Novice's and the power limitation on other classes of operators using the Novice frequencies. The current Novice's would continue to be limited to 200 watts output power, but could operate, using Morse Code, anywhere within the 80, 40, 15 and 10 meter bands.

As a volunteer examiner (VE) for the past two years, it is my experience that the majority of people seeking an amateur license are only interested in the no-code technician license. Our VE team continues to encourage those people to upgrade and pass the 5 wpm code so that they may enjoy more of what amateur radio has to offer. Generally, this falls on deaf ears.

As an active and dedicated radio amateur, I fully believe in the value of the Amateur Radio Service and its proven value to society as outlined in paragraph 1 of your BACKGROUND discussion. The no-code experiment for amateur licensing has failed to live up to the goals and values as outlined in your discussion. I have seen no evidence of the no-code license producing any significant advances in communications or enhancements in the Amateur Radio Service. I, therefore, recommend that the entry level technician license have the requirement of a 5 wpm code examination plus the current written examination.

B. Greater Volunteer Examiner Opportunities

I agree that an Advanced class licensee (VE) should be able to administer all examinations for an examinee for a General Class license. Also, a General Class licensee (VE) should be able to administer all examinations for a Technician Class license. I also agree that in all cases, examiners can only administer those elements for which they themselves have received credit. This would be of great help in being able to attract a larger group of volunteer examiners. As the local team leader for the VE effort, this would take the pressure off of the Extra Class VE examiners available.

C. RACES Station Licenses

As the ARRL Section Manager for the Pacific Section, my Section Emergency Coordinator is making every effort to strengthen the Amateur Radio Emergency Service (ARES) which has a broader coverage for emergencies communications. ARES is replacing RACES and, therefore, I agree with the proposal to not issue new RACES licenses.

D. Privatization of Certain Enforcement Procedures

No comment at this time.

E. Telegraphy Examination Requirements

The Commission's rules which delineate three levels of skill in telegraphy of five, thirteen, and twenty wpm for the amateur service appears to be appropriate for the purpose of providing a reservoir of trained operators, technicians and electronics experts. The belief that telegraphers would be in less demand than electronics and communications experts in the amateur service may be true so long as all satellite and relay communication systems continue to function during an emergency. Since 1990 when the no-code license system was introduced for the amateur service, we now have thousands of unskilled operators whose contribution to advanced communications has not been proven.

The amateur service remains the only service that has a compliment of trained operators in all modes of communications. For those persons who do not wish to breach the barrier of at least 5 wpm, they may still take advantage of the CB band.

I believe that 5 wpm should be the requirement for all classes of amateur license. Additional Morse Code requirements for higher classes of license are useful for providing an incentive to those amateurs who wish to increase their skill level.

F. Written Examinations

The written examinations for an amateur license continue to be comprehensive in determining the operational and technical qualifications required to perform the duties of an amateur service operator. In listening to both the HF bands and the VHF bands, it is clear that the newer licensees have not developed the skill level and the understanding of good operator performance. I would recommend increasing the number of questions concerning operator performance and FCC rules and requirements.

Thank you for the opportunity to comment.