

Before the Federal Communication Commission, Washoington, D.C. 20554.  
In the matter of WT DOCKET 98-143

RM-9148

RM-9150

RM-9196

1998 Biennial Review Amendment of Park 97 of the Commission's Amateur Service Rules

To: Federal Communication Commission  
Comments of:

### **I. Introduction**

I William Christian (W5BC), 6413 Deer Park Lane, Lumberton, Texas, 77657 file these comments on November 21, 1998 in the FCC' Notice of Proposed Rulemaking, WT DOCKET 98-143.

Enclosed are my views and comments on several areas of concern to both the FCC/FCC rulemaking NPRM and to the future of the Amateur radio service. I will make some of my ideas and views evident in the ten areas of concern by the FCC and Amateur Radio. Most of my views are short and some I hope will be clear as to intent and content. Nine of the ten areas are presented in an order as has been published in one of the Amateur Radio journals of November, 1998, "CQ Magazine".

In making comments of my views as a licensed Amateur Radio operator holding the Amateur Extra Class license and have been a licensed Amateur Operator since 1964. I have taught licensing classes both code and theory in the past and I'm active in Amateur Radio as well as my wife on a daily basis.

### **II. Number of Amateur Radio Classes**

For a number of years we have had five classes of license: Novice, Technician, General, Advanced, and Extra. Before that we had as few as one class back in the old days. It's only been in the past few years that six classes were in effect to allow for the no code license. The proposed reduction in classes and proposed reduction in the code speed requirement would relocate the classes such that there could be four classes. The four classes of licenses: "EXTRA", being the top class; "ADVANCED"; "GENERAL", the intermediate class; and "NOVICE or TECHNICIAN", a beginner/entry class as the no code UHF/VHF only class. A "Novice or Technician" could take a code test and a bit more theory/operating practice test move up to the "General" class, then with additional H.F. privileges added, or even with a little more code speed and theory test move up to the "Advanced" class and still a bit more code speed and theory to the top "Extra". Four classes will be adequate to cover the range of operator privileges needed in the Amateur Radio Service.

**William Christian  
WT DOCKET 98-143**

### **III. Novice Class**

**In the past the Novice class has been the entry class to Amateur Radio. It was designed to help the beginner to get on the air and improve his/her operating skills and to prepare for a license upgrade. Many operators honed their skills as a Novice to up grade to Technician class or up to the General class. With the introduction of the NO CODE class license, the Novice has been effectively by passed and either the licensee stays at the NO CODE level and only cares for the UHF/VHF privileges or he/she will study to upgrade. Therefore the Novice license has no real need anymore as it did in years past. I feel that with some changes in the classes of Amateur licenses that Novice could be dismissed.**

### **IV. Disposition of Novice Bands**

**Since a code exam is needed to operate in the H.F. portion of the Amateur Radio spectrum, these bands that the Novice used exclusively for C.W. at a reduced power level could be reassigned back into the General Class band privileges and the power level be the same as it is for the General Class license. NOTE: However, if the ITU were to allow C.W. operation in the H.F. bands without a required morse code, speed exam, then I'd keep the Novice bands as is and allow NO CODE to use them for C.W. proficiency and license up grade practice.**

### **V. Technician Plus class**

**This class of license, the Technician Plus, has a required five wpm morse code exam and the General class theory exam, should now be up graded to a General class license with the full privileges associated with that license class. There is already the NO CODE Technician class in place-do away with the Novice and Technician Plus and grandfather the Technician Plus to General and give the Novices a code credit toward a General license and make them Technician class, till they pass the General theory exam, that would even out the classes with respect to the code requirements most likely being reduced somewhat and giving the Technician Plus class a place with respect to their already having passed a higher theory license and morse code exam.**

### **VI. Advanced Class license be permitted to be VE for General Class Test**

**Advanced class license be permitted to be the VE for General class test. YES! any higher class license should be able to oversee a lower class license exam using the three required testing VE's as regulations now require.**

**William Christian  
WT DOCKET 98-143**

**VII. RACES licenses be phased out.**

**RACES licenses be phased out. YES! all that is necessary is the registration of the individual Amateur station with the proper civil authority with the individual's call sign.**

**VIII. Amateur Auxiliary improved enforcement of Amateur Service Rules**

**It is rather unfortunate BUT the enforcement of the rules and regulations will need help of the FCC. The Amateur Auxiliary may be able to ask Amateur Stations to clean up their stations or operations--But they will not have the POLICE authority to do very much. However, if a Amateur Auxiliary has a problem with a station/licensed person and it becomes a repetitive problem the Amateur Auxiliary's complaint to the FCC should carry some weight as to the FCC taking the appropriate action to the offending station.**

**IX. Telegraphy Examination Requirements**

**For the past 75 years Morse code at or near the present speeds has been in place. I feel that to reduce the morse code very much will only DEGRADE Amateur Radio's quality. The NO CODE license has allowed a lot of people into Amateur Radio that still don't know what to do or how to do it! There are some who have gotten into the service and worked hard and made something out of Amateur Radio. Just because people now days are lazy and complacent, does not excuse them from learning the morse code, nor what the other countries do as to their Amateur Radio Service, should determine what we, as the U.S. Amateur Radio Service does with our morse code standards. We have always been a leader in the world and not the follower. I can see where a slight reduction in morse code requirements may be in order. The three levels would be for five wpm code speed to get the general. Ten wpm code speed for General to Advanced class and fifteen wpm code for Advanced to Extra class. These code speeds are within easy reach of nearly all who really want to make it to a higher Amateur Radio class license with out undo hardship (other than a medical hardship). The person who can't or rather won't learn a higher code speed proficiency really doesn't want to have a higher class license--otherwise it would be as the CBer's are now, out of control. So the morse code at five, ten, and fifteen wpm is every bit a viable requirement and will help, not only cull out the ones who do not want to study and practice but the ones who would only turn the**

**Amateur Radio bands into CB bands. I would stress keeping the morse code requirements and being a leader in the world of Amateur Radio.**

**Willaim Christian  
WT DOCKET 98-143**

#### **X. Written Exam changes**

**Provided the Amateur Radio Service reverts to a four license class service. The Technician (or Beginner class) will surely need a more involved operating practices exam-- I've found that there are a lot of NO CODE licensee's who know very little or nothing about operating practices---many still talk and act as if they are on "CB", some still use the "10" code and most don't know how to break into a repeater discussion properly and I've seen some who just jump in on top of others, who are already using a repeater, just so they can get attention. This is all a fall back from the CB way of operation NOT the Amateur way. There is a REAL need for a more thorough testing on rules and regulations as well as operating practices. For the Beginner class, whatever, a good basic math and simple electronics and electrical safety, exam would be enough but a very thorough coverage of rules and regulations and operating practices is a MUST.**

**For the remaining three classes a more inclusive electronics, electrical practice and safety, rules and regulations and of course operating practices continue. Operating practices, rules and regulation would be a part of all exams as well as electrical practice and safety. Theory and electronics for the modes of operation and emissions available for each higher class license would dictate more about the tests given for those classes, much as it is done today. The tests for each class does not have to be limited to twenty, thirty, or thirty-five questions. Fifty or one hundred questions would not be too difficult for any average person since there isn't any time limit. and additional questions would be made up from safety, operator practices and rules and regulation.**

#### **XI. Conclusion**

**This ends my views and ideas for some of the NPRM. I find areas lacking in the Amateur Radio service and I find plenty of strengths as well. I have found that the NO CODE licensee's still needs a lot more training to be a good operator and if they don't get the information from the start and are not required to learn it at the onset then they won't be a good operator later. Code needs to be retained and maintained to keep the quality of Amateur Radio operators apart from the CBer's and to maintain to some degree the heritage of Amateur Radio, sure the computer is taking over and I think that that is well and good but not every one uses a computer and there are still a lot of operators who use and enjoy the C.W. mode of operation. With so many facets of Amateur Radio to pursue, it's hard to cover everything.**

**William Christian  
WT DOCKET 98-143**

**And with the influx of the new NO CODE licensee's it's necessary to keep the new comers prepared as how to properly operate and use Amateur Radio and to have the insentive to upgrade to higher class licenses and to maintain the quality that Amateur Radio use to have only a few years ago. Let's not be concerned with what the other countries think their Amateur Radio should be like or whether we have more or less code speed requirements or three, four, or even classes of license but rather the kind of quality we can maintain in our Amateur Radio Service. These comments respectfully submitted to the Federal Communication Commission with my thanks for allowing me to voice my opinion and make these views and comments.**

**Sincerely,  
William Christian-W5BC  
6413 Deer Park Lane  
Lumberton, Tx. 77657-9751  
November 15, 1998**