

**Before the  
Federal Communications Commission  
Washington, D. C. 20554**

In the Matter of \_\_\_\_\_

1998 Biennial Review  
—Amendment of Part 97  
of the Commission’s  
Amateur Service rules

WT Docket 98–143  
RM–9148  
RM–9150  
RM–9196

To: Federal Communications Commission

**COMMENTS OF: George H. Shands, W9WUU**

**I. Introduction**

I, George H. Shands, 1117 Wellesley Road, Madison, Wisconsin 53705, file these comments on November 25, 1998, in the FCC’s Notice of Proposed Rulemaking, WT Docket No. 98–143.

I am a radio amateur, General class, with call sign, W9WUU. I first was licensed in 1953 as a novice class amateur radio operator (WN9WUU) earning my General class license in 1954. I operated in the high frequency amateur bands until leaving the air in 1965. After a thirty-year hiatus, I returned to the high frequency amateur bands in late 1995 shortly before my retirement from teaching. Upon my return, I found that many of the frequency privileges that I had earned in 1954 had been taken away as a result of something called “incentive licensing.” Later, I will speak to incentive licensing as it regards the Advanced class privileges.

I am a CW operator, having fewer than five radiotelephone contacts in my logbook. My intention herein is to comment on a number of FCC proposals. My sources of information include the ARRL through its *QST* publication, and the amateur radio publication, *CQ*.

## II. Number of Amateur Service License Classes

I support the reduction of license classes from six to four: Technician, General, Advanced, and Extra with those names. I do not support the combining of the Advanced and Extra class licenses at this time.

## III. Importance and Disposition of the Novice Class license

Although I came into amateur radio through the then new Novice program, it appears this opportunity has been surpassed as an entryway by the Technician class license. I support dropping this license class with due protection of those hams who presently hold this license. They should be grandfathered in with the usual opportunities to seek higher class licenses.

Frequencies presently allocated to Novice class operation should be re-allocated for use by the remaining classes as proposed by the ARRL as set forth in *QST*, December, 1998, pp. 49–50.

Novices would continue to be limited to 200 watts output power. *CQ* magazine, November, 1998, p. 94, states that “The FCC suggested a possible answer” to the question of continuing Novices: “...Novices would continue to be limited to 200 watts output power but could operate using the Morse code *anywhere* within the 80, 40, 15, and 10 meter bands.” [Emphasis added.] In my reading of this FCC proposal, “anywhere” means a Novice could operate Morse code within the Extra, Advanced, and General class frequency allocations. I oppose this, *unless* the same applies to the Advanced and General classes also; that is, present Advanced and General class licensees may operate Morse code *anywhere* in these named bands—in which case I would then support such a solution.

#### **IV. Advanced Class VEs for the General Class**

I agree with both the FCC and ARRL that Advanced class VEs should be permitted to examine applicants for the General class license.

#### **V. Phasing out RACES Station Callsigns**

I support.

#### **VI. Enforcement in the Amateur Radio Service**

While I have no specific comment on this matter, I do strongly urge the FCC to increase its oversight of the amateur frequencies for violations of procedure and good operating practices, and such things as inappropriate language, constant and continuing harangues against various political figures, etc. One thing that has caught my attention upon returning to the air after 30 years away is the coarsening of the language used by some radio amateurs, including swearing and profanity, as well as political diatribes against top political figures. From time to time, I observe what can only be described as malicious interference of one radio amateur by another, usually related to the use of a particular frequency. I realize that society, in general, is much less civil and much more coarse than it was before 1965 when I left the air. However, if the FCC, by itself or through the authorization of others, can more adequately police the ham bands and remove the noxious operators, I would be most supportive of such efforts. Indeed, I applaud some recent publicized efforts of the FCC and other governmental agencies to crack down on several amateurs who have gone beyond the pale.

#### **VII. Telegraphy Examination Requirements**

#### **VIII. Written Examination Requirements**

This aspect of any potential rule changes is, for me, the most difficult. I am a telegraphy (CW) operator and advocate. I am well aware that Morse code no longer has the standing in radio that it once had; that the military, the Coast Guard, and a variety of other civilian services have either abandoned it or have reduced their use of it. So why

should there remain a requirement to learn the code as a requisite for operation on the high frequency ham bands; and if there is such a requirement, what proficiency using the code should an operator have? The spectrum of responses to these questions can range from no change in the requirements to even more stringent requirements, to no code requirement at all, or to some level of proficiency in between.

Some two years ago I wrote a letter to the Quarter Century Wireless Association expressing my view on this matter. It was published in their journal. I argued that there were two reasons for keeping the code requirement: 1) that when the most sophisticated current technology fails (as it always seems to do when you need it most), there's always the Morse; and 2) requiring a level of proficiency in the code, whether one uses it or not after being licensed, promotes a well-rounded, adequate radio amateur. The Morse code requirement acts as a gateway to amateur radio that I believe should be retained. Why should it be retained?

Let me try an analogy. When a young person enters any branch of the military, the recruit is soon placed in formation—squad, platoon, company, etc.—and learns to march. Hours, days, weeks pass and the recruit continues to march, march, march. Today, however, no one expects troops to march into combat in nice, neat, orderly rank and file units. Probably the last time that occurred was in our Civil War; think of the casualties. That sort of precision marching is useless in warfare today—and yet every recruit will do it *ad nauseam*. Obviously, the purpose of marching is for some reason other than going into combat. The purpose is to learn group discipline, cohesion and identity, to learn military culture, including history and tradition which links the recruit to all those who earlier have marched on those parade grounds, and to experience the pride that comes from doing something well. To me, learning the code is to amateur radio as learning to march in formation is to the military. One may not use

these when going on the air or into combat, but one has achieved some important intangibles along with the tangible. Learning the code or learning to march are those tangibles which convey the intangibles. Morse code links us to the history and traditions of radio, it provides a discipline and skill one must practice to succeed, and it would be hard to argue that one does not feel pride when one has succeeded in passing the code test. To me, this is valuable and desirable. Hence I support a code requirement.

As to the speed requirement, two years ago I would have argued to maintain the current three code speed requirements: 5, 13, and 20 wpm. Since I am a General Class licensee, I have passed the 13 wpm exam which, in 1954, required one minute of solid copy. Today, I would prefer to retain the 13 wpm requirement for General and Advanced classes and the 20 wpm for Extra. I am willing, however, to make a trade-off:

Here is where I return to the matter of incentive licensing. The Extra class license has a monopoly on the first 25 kHz of the 80, 40, 20, and 15 meter bands; i.e., the CW sub-bands. In the past, when an amateur passed the Advanced written test, that amateur was granted greater frequency allocations in the radiotelephone portion of these bands. Radio amateurs who wished greater radiotelephone frequency privileges had an incentive to pass the Advanced class and later, the Extra class exams. Nothing was gained, however, by the Advanced class licensee in the CW sub-bands. Presumably this situation existed because the Advanced class licensee had not passed the higher speed code requirement of the Extra class. (One might suspect these frequency allocations were determined by Extra class CW operators feathering their own nest.)

Now, if the FCC reduces the code speed requirement to 12 or 13 wpm for both Advanced and Extra class licensees, it seems to me that the *fair and just* consequence

would be to grant the Advanced class licensee a greater portion of the CW sub-band, leaving for the Extra class licensee, say, the first 10 or 15 kHz of those bands. This would place incentive licensing into the CW portions of the high frequency bands where presently no incentive exists for a General class licensee (who is a CW operator) to seek the Advanced class license. *I believe there can be no justification for the Extra class license to retain a monopoly on those first 25 kHz of those four bands if the code requirement for the Advanced and Extra classes is identical.* I would urge the FCC to consider the merits of this argument and act favorably toward it.

Should the top code speed not be reduced to 12 or 13 wpm for Advanced and Extra classes with an expanded CW sub-band for the Advanced class license, then I'd support the continuation of the present code exam speeds.

### **The Written Examination**

Co-mingled with the question of code is the question of the written examination. If the code speed is reduced, the FCC questions, should the written examination be made more extensive, presumably tougher. At first blush, the answer is probably "yes." There is, however, another perspective to consider, and I must admit that my response is self-serving—although I suspect it may not fall far from the mark for many others.

We need to keep in mind that amateur radio is many things to many people. I am neither a tinkerer nor an experimenter. What tinkering I do usually involves antennas and lightning and RFI protection. (I did build my first transmitter, I have assembled a number of kits and I am looking forward to building a simple QRP transmitter.) At age 61 I still have much to learn about many things, but I doubt if I shall ever design and build digital equipment. I am a CW operator whose niche in amateur radio is to talk with other amateurs around the world and within my own country. I enjoy contesting. I believe that operating your equipment to the highest level of your ability and

establishing friendly contacts with people in other countries is of great benefit to our country and to humanity in general. In my view, that use of the radio spectrum is at least as high a use as experimenting—although I'd guess my view might not be embraced by all.

I suspect that most active Extra and Advanced class licensees do relatively little building and experimenting. They probably perform more in the way of services to the public than they do in developing new designs—unless they work for electronic firms wherein that's their job. For me to take the same test which includes a rather deep understanding of radio theory and practice in order to acquire some additional operating frequencies is comparable to raising the code speed requirement to 30 wpm for a radio amateur who desires nothing more than to develop and test new designs for digital radiotelephony. The Extra class licensee working CW using his Ten-Tec transceiver at 20 wpm is no different than this General class licensee using my Ten-Tec transceiver at 20 wpm. His ham radio interests are no different than mine. Yet the Extra class enjoys more of the CW sub-band than do I. If our operating practices are the same, perhaps our privileges should be the same.

Down deep, I'd prefer the FCC to return us to the pre-incentive licensing period. That involved passing the General class exam, both code and written. Those who choose to operate on the air will hone their skills; those who wish to experiment and tinker will hone their skills and knowledge whether there are more difficult tests or not. Deep down, I question whether the examinations really achieve what they are intended to achieve. They weed out and they weed in, which is their intent, but do they really make us better radio amateurs?

Thank you for your consideration.

Respectfully submitted by:

WT Docket 98-143  
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/s/

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