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Federal Communications Commission  
Office of the Secretary  
Magalie Roman Salas  
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Subject: WT Docket No. 98-143  
1998 Biennial Regulatory Review RM-9150  
Amendment of Part 97 of the Commission's Amateur Service Rules RM-9150 and RM-9196

I, Robert W. Rettie, KF4WLM, have the following comments regarding restructuring of Amateur service:

1. Morse code has only a minimal role in modern communications. Morse code is now used mainly for recreational purposes and it's use for any emergency is highly unlikely.
2. There are no longer any reasons to require code testing for voice access. Even the ARRL confirms this. In a 26 Oct 98 Email to Rod Stafford, I asked why does the ARRL board want me to learn code to have voice privileges on my HF radio and why should I or any other new hams want to belong to an organization whose board position is to require code for voice access? His 26 Oct 98 Email back to me said "If you think this is the most important issue facing amateur radio today, then I don't have an answer (certainly not a suitable answer) to your question." In his 30 Oct 98 Email to me Rod Stafford states "... most ARRL Board members feel CW should be required. There is no answer as to why they feel this way. Some feel it is because it has always been required, some feel it is still a prominent mode, some feel that when you work for something you give it more value, etc."
3. Many people do not have the talent needed to learn code. It took me 7 months to get up to 5 words per minute. I tried 2 learning courses that were guaranteed to get me up to 13 words per minute; they did not work for me. About half of the people that I have surveyed could not learn code. One person is Dr Gerald Wheeler. On page 7 of his course book 'Code Quick 30 Day Mastery Plan,' Dr Wheeler says "I struggled with code for over ten years before I was finally given a 'gift' of a general license." I have a personal friend that could not pass a 5 word per minute test for years. It is unfair to discriminate and deny voice privileges to people, because they do not have the talent needed to learn code.
4. All Morse code testing should be eliminated.
5. Until the international treaty requirements can be changed to eliminate any requirements for code, no more than 5 WPM should be required for any license class.
6. The FCC <sup>Regs</sup> should be revised to automatically eliminate any code requirements as soon as the International Radio Regulations can be changed eliminate code requirements.
7. Only three classes of licenses should be needed.

Truly,



Robert W. Rettie

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