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

In the Matter of )  
1998 Biennial Regulatory Review - )  
Amendment of Part 7 of the Commission's )  
Amateur Service Rules )

WT Docket No. 98-143  
RM-9148  
RM-9150  
RM-9196

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COMMENTS OF  
William W. Spurrier  
P.O. Box 1244  
Rockport, Texas 78381  
20 November 1998

I William W. Spurrier, licensed amateur radio operator KC5ZSR, file these comments on 20 November 1998 in the FCC's Notice of Proposed Rule Making WT Docket 98-143

I wish to comment on the subject Docket, the proposals submitted by the American Radio Relay League and submit my own proposals for streamlining and improving the rules regarding the Amateur Radio Service.

As noted above I am a licensed amateur radio operator, holding a Technician Plus grade of license. I was previously licensed under the call sign WN8NUM during my senior year in university, 1953 -1954, but was not able to upgrade before the license expired at the end of one year. I received my current call during 1997.

The subject NPRM under consideration and its errata are so incomplete and self contradictory that I am not qualified to pick it apart and comment line by line. I will therefore not do so. If it is indeed the Commission's intent to streamline the rules and reduce the administrative workload, the proposal submitted by the American Radio Relay League will come closer to doing so than the NPRM. The ARRL

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proposal is a reasonable document and does not leave the unanswered questions and contradictions contained in the NPRM. The proposal clearly delineates the four classes of operators and how to arrive at them without penalizing any current licensees. It outlines an orderly advancement procedure and does not leave the Novice and Technician Plus operators hanging in limbo, as was the case with the NPRM. However, I stop short of recommending adoption of the ARRL proposal.

Since it appears that The NPRM will be very difficult to fix by amending on a line by line basis, I propose that the Commission start with a clean sheet of paper and attempt to carry out the intent of Congress to simplify, streamline the system and reduce the administrative paperwork load. I would go further to recommend that we look ahead at trends in license structure in other countries and attempt to position the U.S. structure so that it may, as much as possible, fit well with the international community for the foreseeable future.

It is my feeling that the FCC in its role of the administrator of public property - the radio spectrum - should cease the practice of making rules which award a rank structure based on how many merit badges the individual operator accumulates. I feel that the FCC should insure orderly access to any legal U.S. resident, providing that there exists reasonable assurance that such person understands the rules applying to the Service, has a minimum level of understanding of operating procedures, will not likely interfere with other stations because of ignorance of normal rules of courtesy and will not endanger himself/herself or others. The Amateur Radio Service has always been a "learn by doing" endeavor, and I feel that regulations should be written to promote and continue that tradition.

The above being said, I see no justification for more than three categories of licensee. This number should allow entry level for the VHF/UHF operator, entry level of a code tested operator to satisfy international obligations and advancement to the highest level by an individual who has a certain amount of operating

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experience and has demonstrated higher levels of technical knowledge. I have no preferred designations for the three categories; you may call them what you wish.

The VHF/UHF license would be the same as the present Technician, with the same operating priveledges and limitations.

The lower level of code tested licensee would be required to pass a 5 word per minute code test, and appropriate written test made up from questions taken from all pools up through the current General Class examinations. This operator would gain access to all HF spectrum authorized U.S. operators, and all VHF/UHF allocations. This operator would be limited to 200 watts PEP, and be required to remain in this class for a minimum of one year before upgrading.

The top level of licensee would be drawn from the lower level of code tested licensee who had fulfilled the one year in grade requirement, and who had passed a higher level of written examination drawn from the current Advanced/Extra pool of questions. This operator would have access to the full HF/VHF/UHF spectrum and would be allowed to use 1500 watts PEP. Individuals in this category would be eligible for 1X2 and 2X1 call signs.

Upon implementation, current Technician licensees would move into the above VHF/UHF category. Current Novice and Technician Plus licensees would move into the lower level HF category and General, Advanced and Extra would move into the top level.

It may be possible to make small adjustments to the phone/cw subbands to conform more closely with the practices of other nations, namely in the 80/40/15 meter bands.

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Test administration should be simplified; VEs would be drawn from the top level licensees. The existing question pools can be shuffled to make appropriate pools for the new license classes.

I can see no valid requirement to continue the RACES station licenses.

I am not qualified to discuss the legal workings of the enforcement system, but I do have comments. There appears to be no way the FCC can delegate its responsibilities in the field of rules enforcement. Whatever procedure is established should encourage easy reporting of infractions by amateur licensees in order to promote self policing by those who use the spectrum.

My proposal would eliminate the problem of code speed waivers for the handicapped.

The above proposals would simplify the structure and reduce the the amount of testing. Further, it would be a better fit into the current and foreseeable reciprocal license agreements, as other nations seem to be going in the direction of reduced code requirements and fewer license classes. The ease of entry into use of the HF spectrum should encourage increased use by individuals who now feel that they are being shut out by a fraternity of old timers. It would seem that this three tiered structure would more easily fit into future treaty modifications and changes in technology. All of these benefits should be possible without significant degradation to the use of the bands. Beyond that it should make a public resource available to any person willing to take the time and expend the effort to meet reasonable requirements.

Submitted by:



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