

Before the
Federal Communications Commission
Washington, D.C. 20554
In the Matter of) WT Docket No. 98-143
)
1998 Biennial Regulatory Review --) RM-9148
Amendment of Part 97 of the Commission's) RM-9150
Amateur Service Rules.) RM-9196

COMMENTS OF Aaron L. Donaldson KB9DWU

NPRM, WT Docket No. 98-143, Section E, Telegraphy Examination Requirements, paragraphs 19 to 25.

1. I agree with the FCC's assessment (NPRM 98-143 Para. 19-21) as to the decreasing role of Morse code in contemporary communications.
2. I believe the use of Morse code by amateurs is now totally within the confines of recreational purposes only within the United States of America.
3. I believe that there is no longer any public/governmental interest served by requiring code testing.
4. I believe, therefore, that only basic proficiency should be required.
5. I also recognize the existence of the international Radio Regulations, Article S25.5, (NPRM Para. 22) and suggest an requirement of ONLY a single code test with only the minimum speed necessary to meet international treaty requirements, but in no case, more than five (5) WPM for all HF license classes.
6. A single minimum code speed examination would also eliminate the need to grant medical waivers to disabled amateurs for the higher speed telegraphy requirements. (NPRM Para. 25 and RM-9196)
7. I suggest that any code requirement used to fulfill the international Radio Regulations, Article S25.5, be written to include language that would continue the code requirement after the ending/elimination of Article S25.5.
8. As a result of all Morse code testing being 5 WPM and considering the small difference in privileges between the Advanced and Amateur Extra Class, I believe only four license classes are needed. These classes would correspond to the current Novice, Technician, General and Amateur Extra Class.
9. I do not believe that Morse Code testing should be totally removed from the Amateur Radio Testing for any reason.

Sincerely,

Aaron L. Donaldson
KB9DWU