

I will keep this terse, if you would rather have nice prose,
I can provide it, but I think this time I'll opt for efficiency.

The Amateur service has lost a lot of it's vitality. The commission suggests that reducing code requirements is a possible solution due to the dramatically reduced number of Novice license applications compared to Technician licenses.

I would suggest a totally different approach. With the advent of the Internet, permitting greater access to parts and expertise, experimentation is actually increasing. However, in today's digital world, dramatic improvements in the digital modes are needed. Unfortunately, the regulations work against experimentation in those areas.

I would suggest restructuring based on power and bandwidth, and eliminate reference to specific modes. For monitoring purposes, require CW identification at less than 20WPM for all modes, permitting monitoring, perhaps even automated monitoring. In a transition period, it may be necessary to permit identification in the mode of communication for traditional modes. For experimental modes, it may be necessary to require substantial logging, but compared to the current situation, this would not pose an undue burden. Even plaintext recording of all experimental communications would present less of a perceived burden than pre-approval by the commission of some experimental mode.

This would give amateurs an opportunity to develop the communications techniques more in keeping with the modern world, and in turn, attract future experimenters who will develop the communications techniques of the next century.

While I do not think doing away with code is a particularly good thing, I cannot make an argument that the current license structure is better or worse than some other. I do believe that CW is critical for communications under adverse circumstances, and that expertise should be maintained for availability in emergency situations. However, I cannot make a case that 13 or 20 WPM is somehow better than 10 or 12. The current examination structure requires increasing knowledge of all modes as one climbs the licensing ladder. It is difficult to see how one can test knowledge of CW in some other way, but it does seem to present a greater barrier in it's current form than knowledge of other modes.

For background, I have been an amateur for 25 years, recently upgraded to Extra. I operate primarily low-power (QRP) CW, although I also operate FM, packet and (rarely) SSB. I happen to live in a community where the county emergency services organization has been aggressive in enlisting the aid of amateurs, and as a result, the amateur community is very active in public service and emergency events.

Thank you for your interest.
John J. McDonough