

In the matter of 1998 biennial regulatory Review, - Amendment of part 97 of the Commission's Amateur Service Rules, FCC WT Docket 98-143:

I agree with the elimination of the Novice Class license. Grandfathering the current holders and allowing use of the full CW portions of the 80,40,15 and 10 meter bands. However I also believe that RTTY should be allowed by these novices, were appropriate and that Computer generated CW should be permitted. The proposed wording of 97.307 (f) (9) requires the code be sent by hand. An alternative approach would be to grant Novice qualified operators full all mode access to the 10 meter band and access to the other bands for CW only, this could allow a interest and migration to the higher class licenses. Code test methods require change as well. The proposal that I would support would require copying a five-minute code transmission with the passing score being one minute of understandable copy. Understandable could be defined by the examiner but should not be allowed to be flawless copy. Disabled examinees should be required to at least attempt the take the code tests before they gain an exemption based on their doctors exam credit sheet.

Code Speed requirements, there should be two speeds required for licensing 5 wpm as the General License requirement and 15 wpm as the Extra Class license requirement. These speed requirements should remain in effect only until such time as they may be eliminated as a requirement by international agreement. If General CW speed requirement were reduced to 5 wpm, the novice qualified operator need only pass the written exam or show that he has passed the exam in the current license period (1 - 10 years).

Again the phasing out of the technician-plus license class is good, with the above grandfathering comments.

Advance class license holders should be able to administer general class license examinations.

The elimination of RACES station license through attrition is highly recommended.

Examination content does require change, with an increase emphasis on the operation of a station and on air practices. Although the technical knowledge is still needed to understand the equipment and repair it, fewer and fewer amateurs are repairing or building there own equipment. At the same time it appears that less and less amateur know how to properly conduct them on the air. The format of the exam, that is multiple choice or fill in the blank answers, should remain and at the desertion of the examiner. Practical observations of whether the examinee is prepared for the upgrade should be required, with the evidence being provided in the form of certification by an advanced class or extra class licensee.

I agree that enforcement process that are related to amateur radio need to be improved, but specifically how and within the legal framework is hard to explain. A proposal of local or state teams of designated and qualified investigators (licensed operators general class or higher) acting on a formal report process and

referring to Federal Attorney in the district for further action
may be a way. Referral to the nearest FCC agency, could work
also, but the commission would not have the manpower to support it.