

To the Members of the Commission Assembled:

I am Steven Robeson. I have been a licensee in the Amateur Radio Service since 1972 and am presently the licensee of Amateur Radio Station K4YZ and hold an Amateur Extra Class Operators license. I comment to you today on the matter of WT 98-143.

There can be no doubt that there has been quantum leaps in the field of radiocommunication since the last major rewrite of Part 97. This includes the "Incentive Licensing" system that was implemented in the late 1960's. It is clearly time to change the system.

The Commission has solicited comments relative to that circumstance, and I hope the following will be considered in that act.

First of all, I would like to wholeheartedly approve of the concept of reducing the number of Amateur License classes from six to four. There is much confusion as to "who's who" as it is now, and a reduction in the licensing process would alleviate that disparity. As such, I envision the following as being appropriate for said restructuring:

Amateur Class D: The Amateur Class D license would become the de facto "entry class" license for the Amateur Service. In light of the grossly decreased demand for the Novice License and reduced useage of the sub-bands allocated for thier use, I would deactivate it as the "entry class" licensese. The Class D License would for all intents and purposes be the same as the current "Codeless Technician" class license. The examination for this license would remove questions pertaining to HF (1.8 to 30 MHZ) theory and operation, and be strictly limited to matters pertaining to VHF/UHF theory and operation, regulatory matters and Amateur practice. All Amateur privileges above 30 MHZ would be conveyed to the successful applicant.

Amateur Class C: The Class C license would be the entry level license for operation on the HF spectrum. It would require the successful applicant either hold a Class D license, or successfully complete the Class D examination in addition to an examination on basic HF theory, propagation and practice. It would also require an examination in proficiency in the sending and receiving of Morse Code at a speed of not more than 5 (five) words per minute. Persons presently holding a Novice Class License or Technician Plus license would be grandfathered into this class of license, except that they would be required to take a 20 question open book examination at a VE Testing Session on the privileges and restrictions of the Class C License prior to utilizing those privileges. Allocations would include those presently enjoyed by the Amateur General Class licensee except for operation of the 160, 30, 17 and 12 meter bands.

Class B: The Class B license would incorporate the present Amateur General and Amateur Advanced license. All amateur priviledges as are presently enjoyed by the Amateur Advanced would be authorized with Amateur General's being grandfathered into Class B. New licensee's would be required to pass a written examination on advanced radio frequency technology, amateur practice, regulations and an examination in proficiency in the sending and receiving of Morse Code at a rate of not more than 12 (twelve) words per minute. This would be consistent with the present CEPT program, which the United States is presently negotiating membership in. Additional frequency allocations would be authorized by the "refarming" of the subbands presently allocated to the Novice Class, and divided with the Class A license.

Class A: The Amateur Class A would convey all Amateur operating privileges to the successful applicant. Present subband authorizations enjoyed in the "CW" bands would be unchanged and new exclusive phone allocations for the Class A would be "refarmed" from the deactivated Novice license and by relocating from the "high" end of present CW allocations where operation is sparse. A quick scanning of those portions of the spectrum will demonstrate that minimal use is made of this portion of the authorized allocations and reallocation to "phone" or other "wideband" emission types is reasonable.

The Class A applicant will demonstrate advance/expert level knowledge of RF technology and Amateur practice. No additional Morse Code examination would be required.

To further simplify the administrative process of the Commission, I would discontinue the present "sequential" callsign system. Upon successful passing of the requirements for an Amateur Examination, the applicant would be issued a "2 by 3" callsign (ie: KA4AAA) by the Commission. Those wishing to specifically select a callsign of a particular format would be provided that opportunity by the "Vanity" callsign system. The Commission would specify those formats of callsigns permitted by class, but it would be up to the applicant to choose the desired call, and appropriate fee paid for the privilege of obtaining said call.

As for the occasionally emotional debate on the retention of the Morse Code requirement, I am steadfastly in favor of retention of the use of Morse Code and demonstration of its use for the Amateur Service. Among its prouder traditions has been the Amateur's ability to communicate across international borders and foster communication between citizens in countries which may not have a common language in which to conduct that communication. Morse Code is the "common denominator" in international communications and should be retained.

As for the argument that more efficient or reliable methods of communication exist, it is a time proven fact that the simplicity of Morse Code systems has allowed us to communicate with portions of the world that cannot enjoy the same level of access to technology that we as Americans enjoy.

And to echo the comments of another commentator to these proceedings, I would like to express my concern over the decline of the overall technical skill and knowledge of the average Amateur. I firmly believe that this is the direct result of the publishing of Amateur Radio question and answer test pools in the public domain. I feel it is as ridiculous a concept as for our schools to republish the questions and answers of mid-terms and finals. Closing the pools except to the VEC's, the Commission, and an independent oversight committee approved by the Commission would go a long way towards ensuring that the successful applicant has a minimal and sufficient retention of the requisite knowledge for an Amateur license.

Lastly, I would consider all of this for naught if the Commission were to fail to make a determined and on-going effort to enforce the rules and regulations as they pertain to the operation of Amateur Radio Stations. It is an embarrassment that we are as frail as any other subset of human society, and we too have our share of ner'-do-wells and rabble-rousers. But unlike a local "protest" or civil disturbances in one localized area, radiocommunication has

the potential of causing a disruption over a massive, if not world-wide area, even when that disruption is perpetrated by only a few "rotten apples". The Amateur Service still prides itself on it's own "self policing" activities, and this activity is unprecedented in any other Service under the Commission's domain, but only so much can be accomplished short of vigilanteism. The Commission's assurance that they will enforce these regulations and back it up with action will be the one greatest action the Commission could take.

Respectfully Submitted,

/s/ Steven James Robeson, LPN
Amateur Radio Station K4YZ