

Before the
Federal Communications Commission
Washington, DC 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

To: The Secretary
Federal Communications Commission

c.c.: Chairman William E. Kennard
Commissioner Susan Ness
Commissioner Michael Powell
Commissioner Harold Furchgott-Roth
Commissioner Gloria Tristani

Comments of: Guy A. Matzinger
Amateur Radio License: W1GUY
on the

NOTICE OF PROPOSED RULE MAKING

Released: August 10, 1998

Summary:

Limit amateur radio licensing classes to not more than three (3) *Technician, General and Extra* and limit Morse code testing to not more than one (1) level of code proficiency at not more than five (5) words per minute (wpm) ... until the International Radio Regulation Article S25.5 is removed (NPRM Par. 22), after that, remove all Morse code testing requirements. These provisions, if adopted, would have the following immediate effect of: (a) reducing the work load of the FCC, three license classes in place of six (b) streamlining the amateur testing program relevant to current and future technology and (c) facilitating the growth of the amateur service.

Number of License classes:

I believe the FCC's proposal should go further towards streamlining and modernizing amateur radio. To this end I suggest that you eliminate, besides the Novice and Tech Plus classes, the *"Advanced"* class license and retain the following classes -- Technician, General, and Extra. All current Novice and Technician Plus licensees should be "Grandfathered" to General class operators and all current *Advanced* class licensees should be "Grandfathered" as Extra class operators ... or else require **all** existing Novice, Tech Plus and Advanced class license holders who wish to *"up-grade"* to the *"new"* classifications to pass, or show proof of having passed, current examination elements 3B or 4B ... but in no instance should anyone loose existing operating privileges.

The *"new"* Technician class should become the sole entry class license. It would grant VHF privileges and entail a single basic written test, but no Morse code test. The *"new"* General class license would grant full HF privileges and should entail a single written test and a single 5 wpm Morse code test. The *"new"* Extra class license should entail a single comprehensive written examination and would signify superior achievement and comprehensive knowledge of all areas of theory and amateur practice; however it would not require an additional level of Morse code proficiency. To aid and advance amateur communications around the world, US frequency allocations (band plans) should also be adjusted, so as to be consistent and

compatible with the majority of ~~International~~ plans. These changes would put the US in alignment with other CEPT countries who, at the most, have only three license classes -- two HF and one VHF and little or no sub-band segregation.

Morse Code Testing:

In 1936 the American Radio Relay League (ARRL) introduced an increase in the speed of testing for Morse code proficiency, auspiciously to stop the growth of the Amateur Radio population. Since that time they have continued to initiate other high-speed code tests that have arbitrarily restricted the number of people who can become Radio Amateurs. Requiring Morse code proficiency as a licensing provision does not appear to be consistent with the Commission's mandate to make radio widely available and to encourage the use of new technologies. Therefore; I support the FCC's suggestion to replace the Morse code requirement with more relevant written testing on various aspects of current and developing wireless communications technologies. Today, Morse code is merely one of many modes of communication and there is no reason to single it out as particularly significant or important. A single 5 wpm Morse test will also remove the necessity of processing and issuing waivers for the handicapped. Eventually, all Morse testing should be eliminated consistent with US International "Treaty" obligations.

RM-9148:

I agree with the conclusions of the FCC regarding this petition.

RM-9150:

There are many avenues of legal recourse presently available that organizations, or individuals, may pursue should they believe that an amateur radio operator is violating any rule or regulation ... they need no more authority than that which already exists.

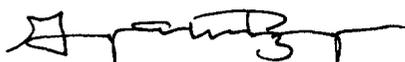
RM-9196:

I agree with the conclusions of the FCC regarding this petition, that is; that this proposal would place an unfair emotional and financial burden on examinees and raise serious privacy and confidentiality concerns. It might also introduce other legal issues ... such as the examiners qualifications and competency to review or question the medical justification for the waiver.

Conclusions:

Although there is still much that needs to be done to modernized Amateur radio, I believe these recommendations are a start towards that goal. They serve the public interests and if adopted would lighten the work load of the FCC by simplifying the licensing processes and they would expand the opportunities for all to use and advance wireless communications technology. It would also insure, into the twenty-first century, the continuing history of Amateur Radio Service in our country.

Respectfully submitted this 21st Day of November 1998.



Guy A. Matzinger, W1GUY
503 Dubois Street
Cheney, WA 99004-1325
Phone: 509-235-8381