WILLIAM B. FREELY, K6HMS
1807 Port Wheeler Place, Newport Beach, CA 92660-662907
Telephone: (626) 395-8415 work, (949) 640-8257 home
29 July 1998

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PRIVATE RADIO DIVISION

Federal Communications Commission
1270 Fairfield Road
Gettysburg, PA 17325

WT DKT # 98-143

American Radio Relay League, Inc.
225 Main Street
Newington, CT 06111
USA

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Gentlemen:

As an licensed amateur radio operator for over 43 years, a retired Air Force communications officer and commander for 31 years, a former FCC employee, and an electronic engineer/ manager, I am incensed with and wish to comment on the recent activities to redefine the amateur radio license structure, and particularly on the reductions in Morse Code requirements.

The FCC and ARRL are stimulating opinions and recommendations prior to making changes. They both want concrete proposals, not complaints. I am attempting to offer only proposals.

I agree that the six license class system is, and was, a mistake. Perhaps three classes, or at most four, will provide the structure to minimize the costs and administrative activity, and provide for proper levels within ham radio. They would be a Class A (equivalent to present Extra class), Class B (equivalent to present General class), and Class C (entry level, combining present Novice and Technician classes). I feel that incentive licensing is still important.

I disagree that the present Novice class is not useful in generating new dedicated hams. I am sure your numbers indicate that, but I know of a small number of active hams who took precisely that path to become excellent CW operators. "My" Class C license would provide for 25 kHz wide CW subbands on 80, 40, 15, and 10 meters (200 watts output maximum), in addition to full authorization above 50.0 MHz. The CW requirement would be 5 wpm, and the written test with increased standards would encompass the material necessary for beginning amateurs with the above privileges. In addition, since the test can be memorized and passed by people unfamiliar with the material (but trained to pass the questions, similiar to aviation licenses), a practical test of 2 hours minimum duration for CW and 1 hour minimum for phone would be taken with 2 or more Class A amateurs on the air. This should be done during a contest or period of high activity, where the applicant's knowledge and skill could be evaluated. Too bad the Novice Roundup was eliminated.

The CW requirement is a key ingredient in amateur radio, and separates those who honestly want to gain privileges from those who want to do as little as possible. CW is not the mode of

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choice for the vast majority, but it provides a way to test people under stress, and teaches them an useful skill. In my military career during crises, we did a lot with CW that similiar equipment could not accomplished with any other mode. I wonder what will happen in the future if CW skill is not continued; many historical events were supported by the use of CW. But I digress.

The Class B would allow for all privileges except those specifically identified for Class A licensees. The CW requirement would be 10 wpm, and the written test with increased standards would include the material presently in the General and Advanced tests. Again, a practical test of 4 hours minimum duration for CW and 2 hours minimum for phone would be taken with 2 or more Class A amateurs on the air during a contest or period of high activity.

The Class A would allow for all privileges, and would be the keystone of the amateur radio license structure. The CW requirement would be 18 wpm minimum (20 wpm preferred), and the written test with increased standards would include all material presently in the Extra test. The Class A license would allow for operation in the first 25 kHz of the CW subbands, and for 25 kHz in the phone subbands on 80, 40, 20, 15, and 10 meters. The practical test would be 12 hours minimum duration for CW and 12 hours minimum for phone, and would include contest and DX operation during high stress situations.

Since you did not request complaints or rationale, none are provided.

I hope that any actions by the ARRL or FCC are considered more carefully and globally than the previous "patches" to solve perceived (and not always real) problems. We require a change; I hope that the public opinion leanings to do away with or minimize CW, to expand phone and digital communications, and to make the amateur radio ranks available to anyone with minimal knowledge (memorization), are balanced and overcome by the historically demonstrated skills and professionalism of genuine amateur radio operators.

Sincerely,

William B. Freely

William B. "Skip" Freely
K6HMS