

**Before the
Federal Communications Commission
Washington, D.C. 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: federal Communication Commission

Comments of: James E. Brown

I: Introduction of respondent

I James E. Brown, 123 South Berlin Avenue, Oregon Ohio, file these comments on November 30, 1998 in the FCC's Notice of the of the Proposed Rulemaking , WT Docket No. 98-143. I am a Corporate safety Engineer with Toledo Molding & Die, Inc. in Toledo Ohio. I have a Bachelor's Degree in Electronics Technology from the University of Toledo. I also am Certified Quality Engineer with American Society for Quality, Certified auditor under Register Accreditation Board, ISO 9000 lead Auditor, Senior member A.S.Q, Member and former vice chairman of the Local Toledo Section of the I.E.E.E Institute Of Electrical, Electronic Engineers.

I have always had an intense interest in getting and Amateur Radio License from the F.C.C, but could not get my Morse Code speed up to 13 WPM. I had no interested in the limited Novice license and the need for Morse Code to operate. I was delight to see the No Code Technician License Offered, but was disappoint in the frequencies allocated to that License. Presently, I am studying to take the No Code Technician License test from the Volunteer Examiner in several weeks.

II: Summary of respondent

I agree with most of the proposed changes and think that there is overwhelming support and evidence supporting the changes by both Licensed amateurs and prospective Amateur Radio Operators. I do take some issue with some of the proposed changes. The rest of this letter will explain by position on each of the ten major proposed changes.

III: Specific comments on each proposed change

- 1.) Are six classes of licenses Unnecessary? RESPONSE: YES
I agree with Technician, General, Advance qnd/or Extra
- 2.) How important is the Novice Class? RESPONSE: Eliminate Novice

- It is very unappealing to most persons because of the Morse Code Requirement. The Code require drives many potential Amateurs to the CB arena.
- 3.) What should be the disposition of the Novice Bands? RESPONSE: limited Power CW bands
 - 4.) Should the Technician Plus license be phased out? RESPONSE: YES
The Morse Code attachment is redundant and the amateur with that technical knowledge should get the general Class
 - 5.) Should Advance class operators be permitted to be VE's for the General class? RESPONSE: YES The VE pool should be enlarged with qualified technical VE's. The Advance Class has demonstrated there technical expertise.
 - 6.) Should RACES station licenses be phased out? RESPONSE: YES
That service is redundant to the many available communication options
 - 7.) How can the Amateur Auxiliary improve enforce of the Amateur service rules? RESPONSE: Present status OK
 - 8.) What Changes should be made to the telegraphy examination? RESPONSE: 5 WPM for General Class, and 10 WPM for Advanced, and 15 WPM for Extra Class.
 - 9.) Should the Morse Code speed be reduced to 5 WPM for everyone as a way to eliminate the need to grant waivers of the higher code speed classes? RESPONSE: only for the NO CODE license. See comment for # 8 Response.
 - 10.) What changes, if any should be made to the written examination. RESPONSE :none

IV Conclusions

There continues to be overwhelming support for a NO Code license if the technical knowledge is verified with the present rigorous test requirements as are require for the General Class. The No Code Amateur require the assignment or access to frequencies in the 6, 20, 40, 80 meter bands.