

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

WT Docket 98-143

1998 Biennial Review	RM-9148
-Amendment of Part 97	RM-9150
of the Commission's	RM-9196
Amateur Service Rules	

To: Federal Communications Commission

COMMENTS OF:

I. Introduction

I, Ronnie A. Bolton, 12490 Ashcake Road, Ashland, VA 23005, Radio Amateur Extra Class, file these comments on November 30, 1998 in the FCC's Notice of Proposed Rulemaking, WT Docket 98-143.

A number of questions were raised for which the Commission requested input in the released NPRM. I respectively submit the following comments in the form of a proposal in response to a number of those questions. Namely, the Number of Amateur Service License Classes, the Importance and Disposition of the Novice Class, Telegraphy Examination Requirements, and Written Examination Requirements. In the proposal, I present the number of license classes be reduced to four (4) in agreement with the NPRM, but with the complete elimination of both the Novice and Technician Plus classes, allowing their incorporation into a new General Class license. I propose reduction of the Telegraphy examination requirements to two (2) elements, 5 WPM and 12 WPM. The only license class requiring the 12 WPM examination would be the new Extra Class license. By incorporating the suggested mode and license class band segmentation, the handicap waiver for the higher code speed could be eliminated because in this proposal only CW segments would be gained by upgrading to the Extra Class license, for which a handicapped person would have no need because of the inability to handle the code. The reduction of the Telegraphy speed requirements, coupled with expansion of the phone bands falls in line with the general consensus that CW plays a decreasing role as a communications mode.

II. Number of Amateur Service License Classes
Importance and Disposition of the Novice Class
Telegraphy Examination Requirements
Written Examination Requirements
Telegraphy Examination waivers

I support the Commission's proposal to reduce the number of license classes to four. The existing system is entirely too complicated and burdensome from both an administrative and an enforcement aspect.

However, to simply end the issuance of these licenses and retaining the bands for existing license holders is not the answer for their future growth. A re-alignment of the remaining license classes could add some attractiveness to the service and provide incentives for upgrading. Not having access to ITU regional regulations, I must admit that I am in ignorance as to whether or not any of my proposed re-alignments are in compliance. Therefore I make this portion of the proposal a suggested guideline.

I propose that the Telegraphy requirements be changed to two (2) speeds: 5 WPM and 12 WPM with the higher speed being required only for the Extra Class license. In this modern age, there doesn't seem

to be any technical reason to support a three-tiered Telegraphy structure. I do feel that the Commission should specify in the regulations how the Telegraphy exam should be administered. There are currently three (3) methods, one minute out of five solid copy, fill-in-the-blank and multiple choice. With the multiple choice method being the easiest, VE teams that use that method are sought out more than those who don't. The method used, whichever it is, should be standard across all teams.

I hereby propose the following license class structure for consideration. For clarity only, I use new names for the "new" license classes (followed by the suggested traditional name in parentheses). The traditional names could remain to keep conversion costs down.

Class A (Extra Class)

Existing Extra Class licenses would map directly to Class A. The main difference is that the exclusive Phone segments have been eliminated. With the suggested expansion of the Amateur Phone band segments, I would venture a guess that most existing Extra Class Amateurs would gladly exchange their three small exclusive segments for more Phone band space. The exclusive CW segments should remain in place as the upgrade incentive. It may even be worth consideration being given to their slight expansion; for example the bottom 30kHz of the 80, 40, 20, 15 and 10 Meter bands. In addition, should any future new Amateur HF bands be considered, exclusive CW segments for Extra Class should be a strong consideration so as to enhance the upgrade incentive. The idea here is to make the Class A license the class for those that are serious about CW and wish to further its position in the Amateur Service. In today's world, a significant technical difference no longer exists between Extra and Advanced Class Amateurs so CW proficiency remains the only distinction. Recommended exam elements are a 12 WPM Morse code test and element 4B which should be reduced in scope technically and instead concentrating on regulations, operating practices, interference problem solving and RF safety.

Class B (Advanced Class)

Existing Advanced Class licenses would map directly to Class B. Class B licenses would have access to all bands and band segments with the exception of the Class A CW exclusive segments. The expansion of the Phone segments would more than offset the possible loss to a newly created 10M CW exclusive Class A segment or expanded exclusive Class A segments. The exam element would be an enhanced 4A, concentrating even more so on the technical nature of the Amateur Service as this license Class would now become the primary target of Amateurs desiring the full aspects of the service. Enhancing this exam would also help offset the fact that the CW requirement is lessened to 5 WPM, the same as the Class C license. Since existing Advanced license holders have already passed element 1B, all they would have to do is present a license that shows holding an Advanced class license pre-dating whatever start date so as to receive credit for the 12 WPM element when testing for a Class A license.

Class C (General Class)

Existing General Class licenses would map directly to Class C. Band segments would remain basically the same with these minor changes: possible loss to a newly created 10M CW exclusive Class A segment; expansion of the 40M phone segment to 7200 kHz, and a segment of the expanded 20M Phone band from 14105 to 14125 kHz designated exclusively for SSTV. This would have the added benefit of getting SSTV out of the middle of current 20M phone band which causes much friction because of non-compatible modes.

Exam elements would be a 5 WPM Morse code test and element 3B. Because Class C would now be the entry level to the HF bands, element 3B should be expanded to be more comprehensive about HF and help offset the now easier CW requirement. Since existing General license holders have already passed element 1B, all they would have to do is present a license that shows holding an General class license pre-dating whatever start date to receive credit for the 12 WPM element when testing for a Class A license.

I further propose that current Novice and Technician Plus licenses and Technician licenses granted before March 21, 1987 also map to Class C. Both have passed the required Morse code element, and with their current 10M phone privileges, they have demonstrated competence in HF phone operation; a privilege currently granted upon passing a 5 WPM Morse code test which obviously has no relation at all to their phone expertise. Mapping these three licenses to Class C would eliminate any tracking of the pre March

21, 1987 licenses, the Novice license and the Technician Plus code credit. The Novice and Technician Plus band segments could also be eliminated along with the associated reduced power requirements, simplifying administration and enforcement. The privileges of the license would make it quite attractive for Class D license holders desiring to explore the HF world of the Amateur service. There would be cost involved in converting existing Novice, Technician Plus, the pre - March 21, 1987 licenses to Class C.

Class D (Technician Class)

Existing Technical Class licenses (with the exception of those that were granted before March 21, 1987 which map to Class C) would map directly to Class D. Full privileges to all bands above 10 meters would be granted. Exam element would be the existing 3A. This is the codeless entry level license.

Suggested Band Plan:

160 Meters

No changes

80 Meters

3500-3650 kHz CW, RTTY and data with the following Class segments:

3500-3650 Class A

3525-3650 Class B & C

3650-4000 kHz CW, phone and image with the following Class segments:

3650-4000 Class A & B

3850-4000 Class C

40 Meters

7000-7050 kHz CW, RTTY and data with the following Class segments:

7000-7050 Class A

7025-7050 Class B & C

7050-7300 kHz CW, phone and image with the following Class segments:

7050-7300 Class A & B

7200-7300 Class C

30 Meters

No changes

20 Meters

14000-14105* kHz CW, RTTY and data with the following Class segments:

14000-14105 Class A

14025-14105 Class B & C

*note: the purpose of the extra 5 kHz above 14100 is to protect beacons from SSB segment.

14105-14350 kHz CW, Phone and image with the following Class segments

14105-14125 Class A, B & C reserved for SSTV

14125-14350 Class A & B

14225-14350 Class C

17 Meters

No changes

15 Meters

21000-21125 kHz CW, RTTY and data with the following Class segments:
21000-21125 Class A
21025-21125 Class B & C

21125-21450 kHz CW, Phone and image with the following Class segments:
21125-21150 Class A, B & C reserved for SSTV
21150-21450 Class A & B
21300-21450 Class C

12 Meters
No changes

10 Meters
28000-28125 kHz CW, RTTY and data with the following Class segments:
28000-28125 Class A
28025-28125 Class B & C

28125-29700 kHz CW, Phone and image with the following Class segments:
28125-28150 Class A, B & C reserved for SSTV
28150-29700 Class A, B & C

All band above 10 meters:
Class A, B & C with existing mode privileges.

III. Conclusions

In view of the downturn that the Amateur Service has experienced in the last few years, this biennial review provides a great opportunity to make changes not only to streamline the Commission's licensing process, but to also re-design the service for the future, making it more attractive to enter. With CW playing less of a role in today's world, we are leaving precious and valuable frequencies almost devoid of use by keeping the current large CW segments. By coupling an expansion of the phone bands with a restructuring of the license classes, room is made in advance for the growth that is sure to follow. It is important however, not to lower the standards technically thus turning it into nothing but another public communications service. Many may find fault with the mapping of existing Novice and Technician Plus licenses to the General Class privileges and consider it a lowering of the standards. Other than the fact that they have not been tested on the limits of their new frequency privileges, there really isn't all that much additional technically in the existing 3B exam over elements 2 and 3A. The lowering of the standards occurred years ago when the question pools were made public. There are many "paper Amateurs" similar to the "certified paper CNE's and MCSE's" in the computer world. People memorize answers and obtain one of the higher class licenses without ever having dealt with a radio or what it's like to actually operate one. Having been a part of the VE program for 10 years, I have seen this scenario many times. Maybe it is time to utilize technology like some of the computer certifications and create adaptive exams.

The existing Amateur service is a hodgepodge of licenses that got that way by trying to patch something that needed overhauling. The only way it can be truly cleaned up and simplified to what it should be is to grant some concessions. Considering how inactive the Novice and Technician Plus HF bands have been, I can't think of a more deserving group to receive a shot in the arm and get them interested and active again. Is it fair that these two groups move up with no additional test whereas current Technicians would have to take element 3B in order to do the same? In the later eyes, probably not. But Novice and Technician Plus Amateurs have HF experience and have demonstrated they can operate responsibly in that arena. Considering the messy alternative of keeping the existing Novice and Tech Plus band segments in place, I think that experience is test enough.