Dear FCC,

In regard to the NPRM for "Streamlining the Amateur Radio Service" I have several comments regarding proposed changes and rules. I believe a simplification of the license classes would be good in the long run, although it might cause some short term confusion. Four classes of licenses would certainly simplify things to a large degree, and I believe this to be the best number.

My greatest concern is about the allocation of subbands among the classes of licenses and modes. It will be hard to simplify subbands in some instances. I am concerned that subband changes plus changes in Morse code requirements might have the side effect of doing away with the use of Morse code on the amateur bands. I don't believe the present novice tech-plus subbands should be changed to phone subbands. A survey of these subbands will show that there is as much activity there as there is in the phone subband of the same band. Beginners who are becoming proficient in the use of morse code need a subband where they can easily find other beginners who are using slower speeds in becoming proficient. By convention and practice, this slow speed area has become the upper part of the CW subbands, or the present Novice Tech-plus subbands.

In addition, keep in mind that the CW subbands are in actuality more than CW Subbands. They also support a growing number of digital modes that share frequencies, and in some cases claim up to 502442450f the available spectrum devoted to "CW subbands." This use will only increase demands on the CW subband allocations in the future.

A change in the Morse code requirements could also have the unintended effect of causing fewer hams to become proficient in its use. If the Morse requirement is set too low, many hams would never use Morse at a speed fast enough to see the real benefits of the mode. It would be equivalent to learning to type at 5 words per minute - not very useful. In regards to the Morse testing requirements, I would support something like 5 wpm for HF entrance and limited use of CW and phone subbands. I believe 10 wpm would be fair for the second level of HF license, and 15 wpm for the highest level. If the higher level of HF licenses provide additional subbands on CW, as the Extra Class does at present, there should be an additional step in Morse proficiency. Any extra CW subband allocations should require added proficiency.

In regard to the telegraphy testing itself, as a long time Volunteer Examiner, I would prefer the return to one minute of solid copy at each speed level, instead of the present requirements which leave the testing to the discretion of the Volunteer Examiners. This method would better test proficiency that the chance to guess at multiple choice answers.

I believe that rules that support the continued use of Morse on the amateur bands are important. Morse code is the basic type of communication, can be used with the simplest of equipment, has the greatest energy and frequency conservation attributes of all modes, is the one mode for which the average operator can still build equipment and advance his technical abilities, and, very significantly, is more available to third-world operators because of its simplicity and relatively low cost in equipment.
Morse code's use in weak signal propagation and experimentation such as

studies of Coherent CW, Moon Bounce, VHF scatter propagation, and meteor scatter propagation underline its importance in the forefront of amateur radio research. In addition, it provides, through the use of internationally recognized and used prowords and "Q-signals" a common language among amateurs world-wide.

Keeping Morse code as an essential requirement of amateur radio licensing, and retaining the CW subbands are important to achieving many of the goals of amateur radio, as outlined above. Thank you for your consideration of these points regarding the restructuring proposals for amateur radio.