

Comments with regard to NPRM 98-143:

My Name is William Jay Sadler. I am a licensed amateur operator holding a Tech+ license. My callsign is KD4AYU. I have been licensed since 1991, and have experimented with radio, electronics, and other scientific pursuits since my early teenaged years. I was employed in various aspects of commercial broadcasting for many years.

I am in agreement with the NPRM 98-143, Paragraphs 19 through 21, that the usefulness of Morse code in today's communications is steadily decreasing. With reference to the Amateur Service, the actual use of the code is limited to recreational purposes only. I support the right of any operator to continue use of the code for his recreational purposes, but feel that the use of Morse code as a testing element has for too long been overemphasized.

While I am aware of the international treaty requirements that mandate testing for Morse proficiency, that mandate is now under close scrutiny and will almost certainly be recalled in the very near future. I am also aware that with regard to Article S25.5, there are no guidelines whatsoever with regard to the code speed required for proficiency.

It is well documented that in the early days of regulation, artificially high code speed requirements were set out to limit the number of potential users, and this fact is so well known that I hardly feel the need to quote any particular reference here. What I will do, however, is point out that this should be viewed while recognizing the huge bandwidths contemporary transmitters were using. Today, we no longer need to discourage applicants to upgrade, but rather need to encourage them.

With regard to testing requirements, I favor more emphasis on the technical and ethical aspects of operating an amateur station. Another thing: There needs to be a lot less emphasis on the testing of band limits for specific license classes than there now is. After all, anyone operating a station on a regular basis will certainly quickly learn the boundaries consulting a band plan or allocation chart while he operates. Instead, more emphasis should be directed on aspects such as interfacing and safety! Above all, emphasize advanced digital modes!

As for Morse testing, since I believe that it will eventually be no longer needed, simplify it for now to a minimum five wpm. Let the VEs determine whether to allow optional multiple choice questions or fill in the blank questions, but require filing the copy sheet with some credible copy as evidence of a bona fide exam having been taken. As for the medical waivers pertaining to disabled amateurs (Paragraph 25), one speed testing would eliminate the need for any such thing at all. They are currently required to pass, in any way the examiner sees fit, what amounts to a character recognition test at five wpm so that any upgrade could be based on a written exam like anyone else. I have personally seen so much abuse of this waiver that I am sick of it; the only reason that I'm not currently holding an extra class license is a sense of personal ethics and integrity.

There has been much discussion as to how many classes of licensing are necessary. Either three or four classes would certainly be better than six! Three would make sense to me, as there is only a small difference in frequency allocation between the Advanced and the Extra Class. If the Morse testing is reduced to five wpm (for the time being, pending changes in Article S25.5) then there should be no problem combining the Extra class

with the Advanced class. This would leave A, B, and C..... or Technician, General, and Extra. In any case whatever action is taken with regard to requirements my personal belief is that the ruling should at this time include wording to abolish the Morse requirement immediately upon the eventual deletion of Article S25.5.

Lastly, whatever course the Commission elects to follow, please do not allow the current practice of allocating operating frequencies to be based for all intents and purposes solely on Morse testing as it has been done in the past. If it is accepted that fulfilling the treaty requires no particular speed requirement, then it follows that once one demonstrates any ability sufficient to access the HF bands at all, that the person should be given some useful operating authority (other than CW) on those bands. Also, please note that the largest HF allocation we enjoy at 10m is needlessly being subjected to unnecessary overcrowding in a smallish subband (28.300 to 28.500.) The crowding there is not necessarily because of the Novice and Tech+ stations there either. There are a great many higher class operators in there because they value contacts with the lower class operators as well. Both Novice and Tech+ stations already have FM privileges and repeater privileges elsewhere, so why segment this huge band for little cause? I see this as evidence that an undesirable pattern has been allowed to develop in amateur radio and that it is especially evident on this particular band.

Respectfully Submitted,

Jay Sadler