

I generally concur with the specifics of the proposal, and commend those who have labored to create it.

These comments are offered in response to the issues raised in part IV (Discussion):

A. I agree with the reasoning behind the proposal to reduce the number of license classes from 6 to 4. I advocate that the new, lowest license class be allocated a major portion of the HF bands, with reduced power. The goal I advocate is to encourage improvement and skill learning, with the "carrot" of increased power and spectrum, yet allow those who have done the extra work to receive some special treatment. I do not have specific proposals for spectrum, but feel that 200 watts is a reasonable power limitation.

As an ARRL Volunteer Examiner, I do not feel that the additional examination effort is a heavy burden, but I understand the administrative load on VEC's and FCC. I advocate the distribution of authority to VEC's, i.e. allowing VEC's to directly update an existing licensee's class without FCC processing (and maintaining appropriate audit trails of the VEC's actions). Initial license applications would be processed by FCC.

B. I agree with the proposal to allow VE's with Advanced licenses to administer General (and lower) examinations. I also agree with the Commission's motion to allow General class VE's to administer Technician examinations.

C. I agree with the proposal to terminate support of RACES. As an ARES member, I believe that the ARES program will suffice.

D. With regard to enforcement, I do not feel that I understand the issue enough to comment.

E. I agree that telegraphy use is rapidly declining, especially in the commercial sector, and I do not advocate using the knowledge of telegraphy as a means of testing skill levels in order to award higher levels of license. Additional questions on exams would be more appropriate. Yet telegraphy (CW) appears to be a very efficient means of communicating (albeit slowly), especially in less-than-optimum conditions, and I advocate that demonstration of this ability be required for the upper two levels of license, perhaps at 5 and 10 words per minute. In testing, I advocate that candidates demonstrate their ability by answering questions by filling in blanks (rather than multiple choice) plus showing one minute of 95% accurate copy plus demonstrating the ability to transmit for 30 seconds at the rated speed.

I agree that the potential for abuse of medical exemptions and the privacy and confidentiality issues make the procedure difficult, and I advocate that no exemptions be made. If a candidate is physically incapable of sending and receiving telegraphy at the expected speed then he or she will be denied the higher class of license. At the same time, I advocate that the higher license level privileges be a relatively small increment, say 10% of the spectrum, so that the loss is minimal.

F. As stated earlier, I advocate doubling the number of questions in written exams while maintaining the same percentages of questions in a given area. Similarly I advocate doubling the size of the question pool. I believe that the examination should be passed by those who know the reason for the answer to a question rather than those who have memorized the question pool, and I hope that the doubling of the sizes will lead to the former. I also see that one error in an answer has less effect upon the percentage of correct answers. I do not believe that the processing of tests will be significantly affected, especially when personal computers are used more and more to perform the testing.

G. I do not feel informed enough on the miscellaneous petitions to offer an informed opinion.

The following comments are general ones:

1. Amateur radio is used by a small portion of our country's people and certainly is not a revenue source. However, I advocate its support because amateurs have demonstrated their utility in situations where commercial radio has failed, and technically oriented amateur radio operators have helped the United States to maintain its technological superiority. I would like to see these goals (disaster communications and technological experimentation) encouraged by the Commission.

2. I believe that demonstrated experience with amateur radio privileges should count for something when conferring additional privileges. For example, if an operator contacts many other stations, uses new technology, or is "on the air" for long enough, he or she should receive credit toward a higher level of license. However, the reasonable measurement and validation of this experience seems to be impossible. I would look forward to other's ideas on implementing this goal.

3. I remember no discussion on costs of licensing, which implies to me that the costs will remain at about the current levels. I applaud this. Amateur access to the airwaves should be unrelated to wealth.

4. I waver between promoting additional licensing of amateurs (go for quantity) and requiring suitable technical knowledge of candidates (go for quality). I admit that I do not have a clear vision of how to define the middle ground that reconciles these conflicting goals. In recent training on organizational communication and decision making, one concept that was discussed was the solution that each participant "could live with" -- not getting one's way completely and not losing on every front. I can live with the proposal.

Thank you for your consideration and the opportunity to comment.

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