

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
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INTRODUCTION:

Personal comments of Ralph B. Winchell, N8UT, Co – Founder of A.R.E.A.* on license restructuring proposal. I am a member of my local VE team.

*(The Amateur Radio Education Alliance, A.R.E.A., is a non-profit membership organization that was formed to support the Amateur Radio Service. It is our expressed aim to “Support Excellence” in communication arts and public service by furnishing high quality educational materials and programs to members of the ARS, free of charge.)

To the Commission:

Your Section III Background statements describing the ARS offers the idea that the ARS “presents an opportunity for self-training, intercommunication and technical investigation.” It further states that “The Amateur Radio Service rules are designed to provide emergency communications, advance radio technology, improve operator skills, enhance international goodwill, and expand the number of trained operators, technicians and electronic experts.” Yet another statement is that “ In view of advanced communication techniques, this is an opportune time to consider additional ways to streamline and simplify the Amateur Radio Service rules by conforming them to contemporary technological advances in the art of radio communication.”

While I agree with most of what is stated above, there are some areas of the FCC rules that are holding back experimentation in important developmental areas. Amateur use of digital voice modes and spread spectrum technologies (particularly for repeaters) is seriously hampered by the rules at this point.

I also feel that the basic definition of the ARS in Part 97 of the Regulations needs some attention. The true future public value of the ARS will be in its’ ability to offer decentralized emergency communications in quality and quantity. The current definition of the ARS *implies* that there is an obligation to perform public/emergency service that coincides with possession of an amateur license. Increasingly, the ARS is being viewed strictly as a hobby . . . an activity with no obligation. It is becoming a common fact that most amateur operators feel no obligation to perform public service or to train for emergency services. Across the board, less than ten percent of all amateurs are engaged in these activities.

The implication of an obligation to perform public/emergency service needs to be clarified, made definite and made to be more of a contractual requirement/agreement for licensing. This will help in the recruitment of public service and emergency service workers. We need to change the “free hobby” attitude and the quickest and most effective way to do it would be for the FCC to redefine the ARS member’s public obligation to serve in exchange for operating privileges.

The Morse Code Requirements

The three levels of 5, 13, and 20 wpm are no longer relevant to modern communications practices and they certainly have no relevance to the quality of operator skills or expertise in any other mode of operation. My personal view is that the use of Morse code as a required test element for any level of license is an absolute waste of time and resources for all concerned. I personally spent over 750 hours to achieve 20 wpm and view it as totally lost time. Despite my proficiency, I do not use Morse code.

Speed requirements above 5 wpm are truly idiotic and have nothing to do with modern communications, good operating habits, or enhancing modern technological investigation. The loudest proponents of the high speed requirements hold a pecuniary interest in selling training tapes, books, and equipment related to learning the Morse code.

I believe that required operational knowledge/skill of high speed Morse code is the largest single road block to true advancement and growth of the ARS. The continuing Morse requirement is keeping a very high number of highly qualified technicians and electronics experts from joining the ranks of the ARS. They view the requirement as a bad joke, a colossal waste of time, and because of the requirement, they have a tendency to view the ARS as antiquated and possessive of no redeeming modern value.

I believe that any streamlining of the FCC rules should include a clear statement that if the WRC and ITU determines that Morse knowledge/testing is no longer relevant for the majority of nations, that the Morse code requirement will be dropped completely by the FCC within a very short time of that occurrence.

As long as there is an international requirement for knowledge/testing of Morse code, I believe the only test that should be in our ARS system is a 5 wpm requirement. Current VEC tests and procedures are adequate. I am a qualified VE through the ARRL VEC.

The ARRL Survey on Morse Code

I wish to comment on the ARRL survey of amateur licensees regarding attitudes on the Morse code requirement, which you mentioned in your background information. The majority of amateurs currently licensed came through the new No-Code licensing program. The vast majority of this group of licensees are not members of the ARRL. The ARRL membership is disproportionately from the pre-no-code licensing system. The aging membership of the ARRL is decidedly stuck in tradition and history and is determined to maintain the Morse requirement. Any current poll of ARRL members will *always* produce a pro-code result. On top of that, the ARRL felt it necessary to skew the questions in their survey to get the results they desired. Regardless of ARRL claims that non-ARRL members were included in the poll, the number was minuscule and could not possibly be viewed as an accurate non-member sampling.

I ask you, if the ARRL is truly the representative of the ARS, why has their membership remained at a static percentage of all licensees over a period of seventy years? It is arrogant of the ARRL to assert that they represent the seventy plus percent of amateurs who are not members because of disagreement with ARRL policies. ARRL opinions and polls are absolutely *not* representative of the majority of licensees.

Written Test Element Requirements

As a Volunteer Examiner and as a thoughtful and observant operator, I believe that we really need to shift focus in our written test element requirements. Far too much of the material that a license candidate has to study is based on antiquated analog, tube and transistor theory. There has been a noticeable downgrading of operating skills in the past few years. I believe this stems, at least in part, from too much focus on the above mentioned antiquities and not enough focus on common, usable and accepted operating skills.

Yes, we need to know the basics of antennas, transmission lines, propagation, RF radiation danger and amplifier use. However, it is no longer necessary for an entry level or even Extra class operator to know how to actually construct or repair a receiver or transmitter. The economy and technology levels have progressed to such a degree that building and maintaining your own high tech equipment is no longer necessary or viable.

We have to change our perspective and test elements to match the real-time facts of our inexpensive, modular, throw-away technology that is readily available. More importantly, we need to absolutely know what is proper, legal and acceptable and what is not when it comes to actually operating on the air. There is not enough emphasis on actual operation. If it were up to me, all new licenses and all upgrades would

be provisional for one year and three operators would have to sign off attesting to the proper operating skills of the licensee before the license or upgrade became final.

I believe that once the Morse code requirements are gone, the written test elements should become more difficult by a considerable degree and that all modes of operation should be equally addressed.

Elimination of the Novice and Technician Plus

Great idea!! I am all for elimination of both license classes. For those Novices who wish to continue working CW, let them work all of the HF bands, anywhere, at 200 watts.

Disposition of Novice Frequencies

Open all Novice frequencies to general phone usage at legal power limit of 1.5 Kw.

Allow Advanced Class VE to Test General Class Licensees?

Yes! This has been needed for a long time.

Sunset RACES Licenses?

Yes!

Comment on Enforcement Processes

What enforcement? This is a bureaucratic/legal boondoggle. To the average amateur, there appears to be no enforcement of the rules. I have spoken to hundreds of amateurs who would be willing to pay a fee for their license if the money could/would be dedicated strictly to enforcement operations.

Respectfully Submitted
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