

Before The
Federal Communications Commission
Washington D.C. 20554

In the Matter of
1998 Biennial Regulatory Review
Amendment of Part 97 of the Commission's
Amateur Service Rules.

WT Docket No. 98-143
RM-9148
RM-9150
RM-9196

To: Federal Communications Commission

COMMENTS OF:

I. INTRODUCTION

On behalf of the Top Of Panhandle Amateur Radio Club, I, Jerome Doerrie, K5IS, Rt. 2 Box 504, Booker, Texas 79005, file these comments on November 30, 1998 in the FCC's Notice of Proposed rulemaking, WT Docket No. 98-143.

SUMMARY:

Comments for improving the Amateur Radio Service by reduction in the number of classes of licenses, simplifying testing, increasing self policing, and opposing spectrum auctions.

WHO WE ARE:

The Top of Panhandle Amateur Radio Club, K5PH, (an ARRL Special Service Club) serves ham radio operators in the upper Texas Panhandle, the Oklahoma Panhandle and Southwest Kansas. We are a member of the Caprock Intertie which provides storm spotter information to the National Weather Service in Amarillo, Texas, Dodge City, Kansas and Norman, Oklahoma. We work with area educators and have enabled a number of youth to obtain ham licenses. The 20 members of this club cover all six license classes and range in operating experience from over 50 years down to new hams with six months time. This paper reflects a consensus of the membership and serves as a joint filing for each member.

II. NUMBER OF AMATEUR SERVICE LICENSE CLASSES

- Three classes:
1. (no code) Technician -- no changes in examination. 350 watts pep.
 2. General-- 5 wpm code and current theory test. 700 watts pep.
 3. Extra -- 5 wpm code and current theory test. 1500 watts pep.

III. DISPOSITION OF THE NOVICE AND TECHNICIAN PLUS CLASSES

Simplify the situation, grandfather these to General Class.

IV. ADVANCED CLASS VES FOR THE GENERAL CLASS TEST

Again simplify, grandfather to Extra class and eliminate the Advanced Class. Merge the Advanced Class frequency segments with those of the General Class. If this class is kept, then yes let them be Ves for General Class.

V. PHASING OUT RACES STATION CALLSIGNS

As best we can determine at this time, go ahead and phase out RACES callsigns.

VI. ENFORCEMENT IN THE AMATEUR RADIO SERVICE

The FCC has done the American public a disservice by being weak in doing enforcement in all areas. This is an area that can not be turned over to private enterprise, states, or municipalities.

For uniformity of enforcement it must remain an active integral part of the FCC duties. With the increase in the amount of consumer owned devices it is imperative that high standards of manufacture be required with shielding and filters required when units are made in order to reduce or prevent RFI problems and complaints. The scope of PRB-1 needs to be extended to cover deed covenants, so that any person that wants enjoy being an amateur radio operator may do so from their home, where-ever that may be. With protection from criminal or civil law suits, then programs such as the ARRL Official Observer can be used to provide evidence to the FCC to aid in enforcement activities. We need to remove the Abully≡ and social malcontents from the ham frequencies.

Return A the right≡ for any citizen can listen to any frequency. If private communications is desired, then those services need to use encryption. As citizen of a Afree≡ country, it should not be a criminal act to listen to a radio. Unblock the cell phone frequencies.

VII. TELEGRAPHY EXAMINATION REQUIREMENTS

One code test of 5 wpm for both General and Extra Class licenses. Receiving test to be a typical ham QSO with ten multiple choice questions, with seven correct answers to be passing.

Also, include a sending test of a typical ham QSO with either a straight hand key, or an electronic keyer with handles operated by hand. The VE team members must be able to copy enough of the sent code to be able to answer correctly seven or more questions similar to those used in the receiving test. The VE team will attempt to accommodate individuals with handicaps on a case by case basis. Everyone desiring a General or Extra Class license must pass the code element.

VIII. WRITTEN EXAMINATION REQUIREMENTS

The testing process does not serve as a filter to keep out undesirable persons. Rather the test should serve to show that the person has knowledge and skills appropriate for the class of license. The current method and scope of material for all classes is sufficient. Advanced class material would be blended into the Extra Class question pool, with the test being 50 questions with a minimum of 35 correct for passing.

IX. SELLING SPECTRUM

Many ham frequencies are on a shared basis with government agencies and are thus held in reserve for government use in case of national emergencies. We believe that all radio frequency spectrum belongs to all citizens in this country. To that end, it is not proper to sell spectrum . Long term leases would be a better concept so that as conditions change, the spectrum comes back into direct FCC control and is then subject to review. It is not in the public interest to sell of lease any frequencies that are being shared by the Amateur Radio Service.

X. CONCLUSIONS

The proposed simplification in structure of license classes puts the United States more in line with what other countries are doing with their amateur services. This will generate much good well in the international community. With cooperation between the FCC enforcement branch and the amateur community it should be possible to clean up the ham bands. The members of this club expect to be an active part of the Amateur Radio Service with the best years still ahead of us

Respectfully (electronic) submitted by:

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