

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	WT Docket No. 98-143
)	
1998 Biennial Regulatory Review --)	
Amendment of Part 97 of the Commission's)	
Amateur Service Rules.)	
)	
)	

To: The Commission

**COMMENTS OF John M. C. Covington, III
P. O. Box 217122
Charlotte NC 28221-7122**

Date: December 1, 1998

Summary

1. I am in favor of phasing out the Novice and Technician Plus license classes by allowing current holders to renew indefinitely but not issuing any new licenses of those classes. I favor reducing the telegraphy speed requirement for General class licensees from thirteen words per minute to five words per minute. I favor giving Technician class licensees CW-only privileges on the HF bands as suggested by the American Radio Relay League.

Discussion

2. I have been licensed as an Amateur Radio operator for twenty six years, and hold the Amateur Extra class license. Since I have passed all of the exams, I do not expect license restructuring to affect me personally. However, I serve as a volunteer examiner and changes made to the license structure will impact my services as a VE.
3. The Commission is correct in its assertions that the Novice class license has outlived its usefulness as an entry point to the Amateur Radio Service. There is little to be gained by continuing to offer Novice as a license class available to new licensees. Therefore, I support phasing out the Novice class license by having the Commission stop issuing new licenses of this class; but renewing licenses for current holders indefinitely.
4. Likewise, there does indeed seem to be much less need to maintain the Technician Plus class license. Therefore, I support phasing out the Technician Class license by having the Commission stop issuing new licenses of this class; but renewing licenses for current holders indefinitely. However, I do not support combining the Technician

and Technician Plus into a single license class in the FCC computer system. Past experience has shown that the Amateur Auxiliary and other Amateur to Amateur policing efforts is better served by being able to easily identify which Technician licenses have qualified for HF privileges. Also, I find it difficult to believe that maintaining existing Technician Plus class license records as a separate class in the computer system (as it is now) adds significantly to the Commission's burden. If the Commission feels that it must consolidate the Technician Plus licenses with another license class, then I would rather this be done with General.

5. The Commission asks for input on whether the telegraphy examinations and requirements should be changed. Unlike commercial and maritime services, where use of telegraphy is being phased out, telegraphy is very much in use in the Amateur service. Telegraphy is still a very significant part of Amateur Radio's public service communications capability, especially that used by the National Traffic System. For this reason alone, maintaining requirements that encourage improvement of telegraphy skills are still important to the Amateur Service.
6. Despite the need to encourage operators to build their telegraphy skills, I believe that the telegraphy speed requirements for the General class license should be reduced from thirteen to five words per minute. The General class license is the minimum license necessary to participate in most of the HF public service communications, and we need to have more operators with that capability. Five words per minute will be sufficient to introduce telegraphy to General class licensees; they will still have some incentive to improve their speed if they wish to upgrade to Advanced or Amateur Extra.
7. I favor keeping the telegraphy speed requirements for the Advanced and Amateur Extra class licenses the same as they are today. Unlike the General class license, which is sought after because it is the "mainstream" license with HF privileges, many people seek Advanced and Amateur Extra class licenses to demonstrate operating and technical achievement or to obtain preferred call signs. Since having an Advanced or Amateur Extra class license is not critical for access to the mainstream HF bands, reducing their telegraphy speed requirements would only diminish the operating achievement aspect of these licenses.
8. The Commission mentions in paragraph 13 of the NPRM that "VEs are burdened with preparing and administering telegraphy examinations." I would like to suggest to the Commission that Volunteer Examiners, for the most part, do not consider this burden to be unpleasant. Most VEs look forward to providing this service to their community.
9. At their October 24, 1998 meeting; the Board of Directors of the American Radio Relay League adopted a resolution favoring giving Technician class licensees CW (only) emission privileges in the 80, 40, 30, 20, 17, 15, 12 and 10 meter bands. I support this proposal, if it is permitted by international Radio Regulations. The proposal said that "Privileges of the Technician licensee are proposed to include CW emission using the international Morse code in the following "General Class CW" HF

band segments, with a transmitter power not exceeding 200 W PEP: 3.525-3.700, 7.025-7.125, 10.100-10.150, 14.025-14.150, 18.068-18.110, 21.025-21.150, 24.890-24.930, and 28.000-28.300 MHz.” Giving Technician class licensees permission to operate telegraphy on these bands will give them a much better opportunity to improve their skills than they will be able to get on VHF bands in most areas.

Conclusion

10. I encourage the Commission to carefully consider any changes to the Amateur license structure. It is important that any change that is implemented have widespread popular support in the Amateur Radio community. Unlike most services, where users of the spectrum do not often interact with other licensees, the Amateur Radio Service has an almost fraternal nature. Many Amateurs are concerned that wholesale changes to the license structure will lower the testing standards to the point that many people will take the license exam just to be able to use a higher-powered radio than is available to them in services such as the Family Radio Service. If this happens, the Amateur Radio Service will suffer greatly, and cease to have this fraternal quality. For this reason, the Commission should be careful not to disturb the licensing structure too much.