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PANAMA CITY BCH, FLA.  
NOVEMBER 17, 1998

FEDERAL COMMUNICATIONS COMMISSION,  
1919 "M" STREET, N.W.  
ROOM 222,  
WASHINGTON, D.C. 20554

RE: FCC WT DOCKET 98-143 IN THE MATTER OF 1998 BIENNIAL  
REGULATORY REVIEW ADMENDMENT OF PART 97 OF THE  
COMMISSION'S AMATEUR SERVICE RULES

DEAR SIR:

THIS LETTER IS IN RESPONSE TO THE FEDERAL COMMUNICATIONS COMMISSIONS  
RECENT REQUEST FOR COMMENTS REGARDING THE PROPOSED RULEMAKING WT  
DOCKET 98-143 (SIX POINT RULEMAKING)

I AM ONLY GOING TO COMMENT ON ITEMS NR 1 AND 5 (I.E. REDUCE THE NUMBER  
OF HAM LICENSE CLASSES FROM SIX TO FOUR AND SEEK COMMENTS ON CHANGING  
THE TELEGRAPHY (CW) REQUIREMENTS FOR CODE TESTS AND CHANGING WRITTEN  
EXAMINATIONS FROM THE QUESTION POOLS) AS I FEEL THESE ARE THE MOST IMPO-  
TANT PARTS OF THE WT DOCKET.

I WILL FIRST OF ALL MAKE GENERAL COMMENTS WHY I DON'T THINK THE  
PRESENT SYSTEM SHOULD BE CHANGED AND LATER ON IN MY LETTER I WILL  
GIVE A DETAILED LIST OF THE MOSTLY TECHNICAL REASONS WHY THE  
TELEGRAPHY LICENSES SHOULD BE RETAINED.

FIRSTLY, I MUST SAY THAT I AM OPPOSED TO REDUCING THE NUMBER OF  
LICENSES FROM SIX TO FOUR. THE AMATEUR RADIO LICENSE ALWAYS HAS  
BEEN "UNIQUE AND SPECIAL" AS OPPOSED TO THE SO CALLED "SOMETHING FOR  
NOTHING CITIZENS BAND RADIO. AND THE MORSE CODE IS THE BASIC "LANGUAGE"  
OF AMATEUR RADIO. THE ONE STANDARD THAT SETS US APART FROM THE CB  
RADIO TYPES.

BUT IT DOES TAKE A LITTLE HARD WORK AND PERSISTENCE IN THE  
STUDY OF MORSE CODE TO BECOME PROFICIENT ENOUGH TO REACH THE  
VARIOUS LICENSE LEVELS. AND THERE ARE THOSE LAZY INDIVIDUALS OUT  
THERE THAT DON'T WANT TO WORK FOR THE AMATEUR LICENSE AND WANT  
THE TICKET HANDLED TO THEM ON A SILVER PLATTER. I CAN REMEMBER  
BACK IN 1953 (I WAS 15 YEARS OLD) WHEN I LOOKED AT THE NOVICE  
QUESTIONS IN THAT CQ MAGAZINE AND THOUGHT, WHY ISN'T THERE A NO-CODE  
LICENSE, EASY TO OBTAIN? (WELL TODAY THERE IS CITIZENS BAND RADIO)  
ANYWAY, I STUDIED THE 78 RPM AMECO CODE RECORDS ABOUT 30 MINUTES A  
DAY AND IN THREE MONTHS I WAS UP TO 10 WPM AND READY TO TAKE THE  
TEST FOR A NOVICE LICENSE. AND IN A FEW MONTHS I HAD THE CALL SIGN  
"WN0TUT", AND HAD BUILT MY SELF A SIMPLE TWO STAGE TRANSMITTER; THE  
HEATHKIT AT-1 AND WITH A HALLICRAFTER S-38C RECEIVER AND WINDOM  
ANTENNA AND WAS ON THE AIR MAKING CONTACTS. WOW, SO, ALL IT TAKES IS 30  
MINUTES A DAY FOR THREE MONTHS. MOST OF US WASTE MUCH MORE TIME  
WATCHING TV. (AND THANK GOD THERE WAS NO TV IN THAT SMALL TOWN)

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List ABCDE

I CAN STILL REMEMBER THE COMMENTS OF MY HIGH SCHOOL PHYSICS TEACHER THERE IN HAYDEN, COLO., W.L. MURPHY (BY THE WAY HE IS STILL ALIVE) WHO SAID THAT MORSE CODE IS OLD FASHIONED AND OUTDATED. WHY ARE YOU GUYS LEARNING IT, YOU WILL NEVER USE IT! WELL, I AM CERTAINLY GLAD I DIDN'T LISTEN TO HIM AS I HAVE BEEN USING MORSE CODE ALMOST EVERY DAY DURING THE LAST FORTY YEARS PLUS AND WILL CONTINUE TO USE IT UNTIL THEY PRY MY DEAD HAND FROM MY TELEGRAPH KEY.

BUT IS CW OUTDATED IN THE YEAR 1998 BY 1998 TECHNICAL STANDARDS? MAYBE! BUT YOU CAN ALSO SAY THAT CRACKLY SINGLE SIDE BAND (SSB) HIGH FREQUENCY RADIO IS ALSO OUTDATED TECHNOLOGY WISE. PUT UP A SINGLE EARTH SATELLITE SIMILAR TO THE MARITIME SERVICES MARISATS AND YOU CAN HAVE HUNDREDS OF VOICE FM CHANNELS AND TELETYPE TDMA (TIME DIVISION MULTIPLE ACCESS) OR WAIT A FEW MONTHS FOR THE FIRST TESTING OF THE NEW IRIDIUM PHONE SYSTEMS. DOES THAT MEAN THAT WE SHOULD ELIMINATE AND DISCONTINUE AMATEUR RADIO SINGLE SIDE BAND RADIO? ITS OUT DATED! OF COURSE NOT, WE SHOULD NOT AND ESPECIALLY AS EVIDENCED BY THE RECENT COMMUNICATIONS PROBLEMS CAUSED BY HURRICANE GEORGES IN HONDURAS. AND THE SAME THING HOLDS TRUE FOR THE MORSE CODE. IT STILL HAS MANY TECHNICAL AND PRACTICAL ADVANTAGES AND I AM TOLD THAT IT ACCOUNTS FOR SOME 38 PERCENT OF THE OPERATION ON PRESENT AMATEUR HIGH FREQUENCIES.

ALSO, ANOTHER IMPORTANT THING THAT I SHOULD MENTION IS, HOW DO WE ATTRACT MORE YOUNGER PEOPLE INTO AMATEUR RADIO? DO YOU THINK WE SHOULD LOWER THE AMATEUR RADIO STANDARDS TO GET MORE YOUNGER PEOPLE TO LISTEN TO CRACKLY RADIOS, WHEN THEY ARE ALREADY LOST TO NINTENDO AND THE INTERNET. I BELIEVE IF ANYONE HAS A SERIOUS INTEREST IN THE TECHNICAL ASPECTS OF RADIO ELECTRONICS THAT A LITTLE 5 WPM CODE TEST WOULDN'T STOP THEM FROM GETING INVOLVED IN AMATEUR RADIO. I THINK WE MIGHT BE SUPRISED TO KNOW HOW MANY OF THE 81,186 LICENSED NOVICES (1998 CD ROM RADIO AMATEUR RADIO CALLBOOK) ARE BELOW 25 YEARS OF AGE. PROBABLY MORE THAN YOU THINK. QUANTITY DOESN'T NECESSARLY MEAN QUALILTY!

#### SOME ATTRIBUTES OF MORSE CODE:

1. SIMPLE EQUIPMENT - EASILY BUILT AND EASILY REPAIRED. AN ADDITIONAL ADVANTAGE FOR THIRD WORLD COUNTRIES AS WHERE COST IS A FACTOR.
2. OCCUPIES LESS BANDWIDTH OR SPACE. SOME SIX CW STATIONS CAN OPERATE ON THE SPACE THAT ONE SSB STAION OCCUPIES. NO EXTRA CONVERTER NEEDED AS IN RTTY OR AMTOR. JUST A SIMPLE RECEIVER AND TRANSMITTER.
3. SIGNAL TO NOISE RATIO REQUIRED LESS THAN FOR SSB RADIO. FOR EXAMPLE: (FROM RADIO INSTALLATIONS THEIR DESIGN AND MAINTENANCE BY W.E.PANNETT) MINIMUM SIGNAL FIELD STRENGTH IN UV/M REQUIRED FOR 30 WPM C.W. = 1 UV, FOR SSB = 5 UV.
4. MODERATE TO HIGH COMMUNICATION SPEEDS POSSIBLE WITH STUDY AND PRACTICE, I.E. 30 TO 50 WPM AND HIGHER POSSIBLE. THIS IS CLOSE TO 60 WPM RTTY AS THE OPERATORS TYPING USUALLY MUCH LESS THAN 60 WPM.
5. MUCH EASIER TO COMMUNICATE WITH FOREIGN STATIONS (THAN VOICE) THAT HAVE NO KNOWLEDGE OF ENGLISH LANGUAGE BY USING Q SIGNALS AND COMMON ABBREVIATIONS.

6. DUE TO NARRROW BANDWIDTH LESS INTERFERERNC E FROM JAMMING AND CROWDED RADIO CONDITIONS. AND ONE CAN ESCAPE FROM THE MUCH HIGHER CONGESTED SSB FREUENCIES.
7. FOR USE IN EMERGENCY CONDITIONS WHEN SSB NOT WORKING OR WEAK SIGNAL CONDITIONS.
8. AND LASTLY, A VERY IMPORTANT ATTRIBUTE. THE MORSE CODE FIST HAS A PERSONALITY OR A HUMAN ELEMENT THAT YOU DONT HAVE ON RADIOTELEYPE OR AMTOR TRANSMISSIIONS OR ON THE INTERNET AND AT TIMES DEPENDING THE RADIO OPERATOR YOU CAN ACTUALLY RECOGNIZE THE PERSON BY JUST LISTENING TO HIS "FIST."

IT APPEARS THAT THE REDUCTION IN AMATEUR RADIO LICENSES FROM SIX TO FOUR FOR THE PURPOSE OF STREAMLINING THE LICENSE STRUCTURE IS ONLY A GUISE FOR MAKING IT EASY TO GET A HAM LICENSE. (OR IN OTHER WORDS LOWERING THE PRESENT STANDARDS) I DO HAVE ONE POSSIBLE CONCESSION TO REDUCE THE AMATEUR LICENSE NUMBER TO "FOUR" AS THIS APPEARS TO BE THE MAGIC NUMBER. ONE SUGGESTION THAT I COULD MAKE WOULD BE TO RETAIN THE PRESENT TECH PLUS, GENERAL AND EXTRA LICENSES AND SIMPLY USE EITHER THE GENERAL OR EXTRA WRITTEN TESTS TO QUALIFY NEW OPERATORS FOR A NO-CODE RADIOTELEPHONE LICENSE TO OPERATE ON THE AMATEUR PHONE BANDS ONLY. TO OPERATE ON THE TECH PLUS, GENERAL OR EXTRA CW FREQUENCIES ONE WOULD HAVE TO PASS THE MORSE CODE TESTS PLUS THE WRITTEN EXAMS. IN ESSENCE THREE DUAL TELEGRAPH/PHONE LICENSES AND A NO-CODE RADIOTELEPHONE ONLY LICENSE FOR ALL VHF/HF PHONE FREQUENCIES. POSSESSION OF A TECH PLUS LICENSE WOULD PERMIT VHF FREQUENCIES AND CERTAIN HF FONE FREQUENCIES SUCH AS TEN METERS. BUT BY ALL MEANS KEEP THE 5 WPM CW TEST ON THE TECH PLUS LICENSE FOR THOSE (ALTHOUGH IN FEWER NUMBERS) WHO WANT TO USE THE TELEGRAPH ROUTE TO AMATEUR RADIO.

IN CLOSING I WOULD LIKE TO QUOTE FROM CLIFF STOLLS (K7TA) BOOK "SILICON SNAKE OIL" CHAPTER 8:

TODAY, WELL, WHY BOTHER WITH AMATEUR RADIO? YOU CAN CALL TAIWAN FROM YOUR TELEPHONE. ATTACH A MODEM TO YOUR PC AND EXCHANGE E-MAIL WITH A STUDENT IN AFGHANISTAN. OR AIM A SATELLIE DISH AT THE GALAXY-5 TRANSPONDER AND TUNE IN CABLE NEWS NETWORK.

BUT THEN YOU'LL NEVER FEEL THE TINGLE OF A CHIRPING MORSE-CODE SIGNAL WARBLING IN ACROSS LAKE ERIE.

SINCERELY, *Joe Prewitt*

JOE PREWITT W0TUT  
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CC: