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NOV 25, 1998

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FCC MAIL ROOM

DEAR MAGALIE ROMAN SALAS,

IN THE MATTER OF WT DOCKET

98-143 I AM OPPOSED TO LOWERING OR

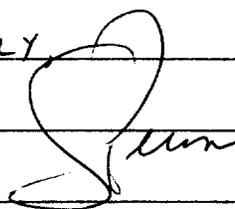
DROPPING ALTOGETHER THE CW CODE REQUIREMENTS

FOR ANY CLASSES OF AMATEUR RADIO SERVICE.

THANK YOU FOR YOUR CONSIDERATION

OF THIS MATTER.

SINCERELY,



EUGENE PERONI

KA6NNR

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23 November 1998

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FCC MAIL ROOM

Office of the Secretary  
Federal Communications Commission  
Magalie Roman Salas  
1919 M Street NW Room 222  
Washington, DC 20554

COMMENTS REGARDING PROPOSED CHANGES IN THE AMATEUR SERVICE RULES

In the matter of WT Docket 98-143

Concerning the changes to the Amateur Service Rules, I would think that the present system works pretty well and suspect that what we are seeing here is change for the sake of change, not for the sake of improvement.

I favor retaining the present three code examination speeds although I am not opposed to dropping the Novice license class.

I would also favor the return to fill-in-the-blank code exams instead of the multiple choice exams. As a Volunteer Examiner who has supervised over a hundred exam sessions I understand that this would require additional effort on the part of the examiners but it would certainly not increase the FCC's workload.

The proposal to reduce the number of license classes has little merit. If the reasoning behind these proposals is to reduce the FCC workload then this reasoning is faulty. Surely the FCC wishes to see the number of licensed amateurs continue to grow. But all the work in the field is done by volunteers, not the FCC, and the amount of paperwork per license is the same whether there are three or five license classes. And since the VECs are filing directly by electronic means the FCC computer time remains the same. The computer time required is directly related to the NUMBER of licenses issued, not the number of classes of those licenses.

I'm certain that many comments have been received favoring the granting of High Frequency (below 30 MHz) operating privileges without requiring a code exam or to reduce the exam speed to the point where is just a formality. But please take note of the present license classes of those making such comments. You will find that the vast majority have a vested interest in this since they presently hold a license that did not require a code exam. They basically want to gain the privileges without the inconvenience of having to study and put forth some effort to achieve their goals.

While some slight adjustments to "fine tune" the present licensing system may be in order I am strongly opposed to changing the present license class structure or to altering or reducing the present code exam speeds.

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As for the abuse of the handicap code exemption, which I believe is rampant, my suggestion is simple. Eliminate it. In all my experience as a VE I have never encountered an examinee with a properly executed exemption that could not have made use of one of the prescribed accommodative procedures. The present accommodative procedures should be sufficient to provide testing opportunities to those with actual handicaps. I've seen too many able bodied persons who managed to talk their doctor into signing a form they obviously don't understand or haven't even read. The instructions to physicians should be in BOLD TYPE and OUTLINED so there is no possible way the physician can not see it.

Eliminating the code waiver could possibly be unfair to a very few people but life itself is not always fair. Blind people cannot be bus drivers. Deaf people cannot be telephone operators. While a very few people may fall through the cracks as the result of eliminating the code waiver I have to believe that, given enough accommodative procedures, that number would be minuscule. For decades before there was a code waiver thousands of persons with severe handicaps managed to become licensed amateur operators. I see no reason why this could not continue.

Sincerely,

A handwritten signature in cursive script that reads "James Viele".

James Viele W8JV  
161 Fox Street  
Hubbard, OH 44425-2122

Dr. & Mrs. Robert Speckhals  
627 Olander Street SW  
Fairbault, MN 55021

November 22, 1998

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To: Ms. M. K. Salas  
Secretary, FCC

DEC 1 1998

FCC MAIL ROOM

From: R. C. Speckhals WBØDMC AMI #820

Re: WT Docket 98-143

Amateur Radio is alive & well  
and many of us still use CW & AM  
modes on a daily basis.

The NRCM to simplify the license  
structure is clearly driven by financial  
consideration from the ARRL.

As a matter of principle as well as  
technical competence, the CW requirement  
is mandatory for the health of the  
Amateur Community.

I do request that the present CW  
requirements be retained & not revised.

Respectfully,

R. C. Speckhals

WBØDMC

AMI #820

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