

FCC MAIL ROOM  
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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 ) RM-9148  
Amateur Service Rules. ) RM-9150  
 ) RM-9196

To: The Chief, Private Wireless Division  
Wireless Telecommunication Bureau

COMMENTS ON  
PROPOSED RULE MAKING

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COMMENTS ON  
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1. I, Nicholas D. Zorn, am an Amateur Extra Class amateur, N4SS, licensed continuously since January, 1955. My first call sign was K4BSS. I am a life member of the American Radio Relay League (ARRL) and have been a member since the late 1950's or early sixties. My amateur radio activities have always been centered on public service, especially disaster and emergency communications. Currently I serve as the coordinator of all National Traffic System (NTS) digital activities in the eastern third of the United States and, to some extent, Canada. I also assist in other areas as requested.

I wish to make it clear that the ARRL does not speak for me on the subjects under consideration here. It is my view that the League is concerned about staying in business (and rightfully so, since amateur radio is becoming more and more like the Citizens Band situation, a result of "dumbing down.") In any event, it will be better for amateur radio and for the nation if we "smarten up" rather than further "dumbing down." If we lose the ARRL then so be it.

2. With regard to the number of license classes, I pose no serious objection to reducing that total to four but I would rather the FCC continued with the present six and institute license fees to pay for the workload and enforcement actions that would have to be supported.

3. I note that there has been some recent Commission enforcement activity. If paying license fees will bring about more enforcement activity then I am willing to pay. We need more enforcement!

Examiner program and reverting to FCC examiners would be very beneficial to amateur radio. This, again, would no doubt require us amateurs to pay license fees and I support such a program.

There is NO DOUBT that the quality of the amateur radio operator community has declined very noticeably since the advent of the VE program. As an example, I have a friend who is an Amateur Extra Class licensee of recent vintage (probably less than twelve years as a licensee). This person has no idea how things electronic work; in fact I have to fix things for him that fail. I have to talk him through adjusting his equipment for proper operation and chastise him for the various mistakes he makes in his on the air operation. Altogether, he is a very poor example of a supposedly well experienced and knowledgeable operator. And he is one of the most active hams in Florida.

5. Because of my firm conviction that we need to upgrade the quality of amateur licensees rather than further degrade the quality I cannot support reducing ANY of the requirements. We should maintain the present telegraphy requirements. We cannot maintain or improve quality if we reduce the standards. Substituting written theory questions for the code requirements will not suffice. Further, we should revert to the "one minute solid copy" code test.

6. With respect to the physician certified waiver of the code examinations I submit the following. I served in the navy for over 24 years and retired lying in a hospital bed in 1975. This was a result of a severe attack of Guillian-Barre' Syndrom. The navy calculations were that I was 110% disabled (which was reduced to 100% of course).

I am little better off today and could pass the code test with ease even though I have little manual dexterity. In fact, I meet CW nets every week to handle traffic. In my opinion anyone who cannot pass the code test because of his physical condition is a severely handicapped quadriplegic restricted to bed or to a "joy stick" type wheelchair. Under such circumstances I support waiving his code test since he isn't likely to operate CW anyway. Waivers for any less handicap should not be granted.

I'm sure you will receive many, many requests for elimination of or severely reducing the code requirements. Please disregard those, they're from folks who want a free ride onto the HF bands. If the FAA reduced standards for pilots because of popular demand would you care to fly with one of those "lesser pilots?"

7. On the question of "re-farming" the novice bands--please, please DO NOT do so. My reasons are these:

a) The least efficient and least effective mode of communication via amateur radio is telephony...talking. At least half the spectrum is already devoted to this mode and is almost totally a waste.

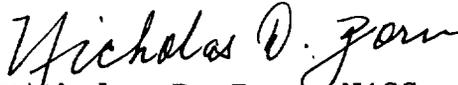
b) Digital operations are becoming increasingly popular and also "squeezed" for operating space. Digital communication is more reliable and accurate than "fone" and can easily provide a written record in the case of emergency or other important communications.

c) The Canadian amateurs observe no band plan and operate on top of our digital operations every day. Expanding the fone bands downward will result in the Canadians moving even further downward and there will soon be no digital (including CW) bands that aren't being jammed by the Canadians. This might be an interesting point to bring up at the next WRC -- to try and get all nations to abide by the same band plan within their region.

d) Preserving the present band plan will provide some inducement for new licensees to use more CW and further increase their ability and knowledge of amateur radio.

Respectfully submitted,

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Nicholas D. Zorn, N4SS