

FCC MAIL ROOM

MAY 27 1998

Before the
Federal Communications Commission
Washington, DC 20554

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In the Matter Of _____

WT Docket 98-143

1998 Biennial Review
--Amendment of Part 97
of the Commission's
Amateur Service rules

RM-9148
RM-9150
RM-9196

To: Federal Communications Commission

COMMENTS OF:

I. Introduction

I, Donald Backys, 3930 N. Firestone Drive, Hoffman Estates, Illinois 60195, file these comments on November 20, 1998 in the FCC's Notice of Proposed Rulemaking, WT Docket No. 98-143. I have been an amateur radio operator for over 39 years currently holding the Amateur Extra Class license. In addition to being an active amateur radio operator I also hold the FCC General Radiotelephone Operators, Second Class Radiotelegraph, and GMDSS Operator's and Maintainer's license.....All endorsed with the Ship Radar endorsement. I am a land mobile systems engineer, Test Center Manager for FCC Commercial exams and a Volunteer Examiner for Amateur Radio exams. I therefore feel well qualified to address the issues in this docket. I have also taught over 400 students in adult evening programs all levels of licensing from Novice through Extra and the GROL FCC Commercial license material.

II. Number of Amateur Service License Classes

There should only be four classes of Amateur Radio License: Technician, General, Advanced and Amateur Extra. No thought should be given to naming the licenses Class A, Class B, etc. By structuring the Amateur Radio Service in this manner it would still achieve an entry level of Technician which would not require a code exam element. It would require an understanding of VHF and UHF spectrum principles along with operating skill requirements and a basic understanding of radio operating principles.

The General Class would become the entry level for those applicants desiring HF operating privileges This level would require an additional written exam slanted towards HF propagation technology and operating skills.

The Advanced Class would remain as it is today.

The Extra Class would also remain as it is today.

As an instructor and examiner, I do believe the Technician level of exam needs to be increased in level of difficulty. Many No Code amateurs I examine do not have even a basic understanding of electronic principles. Many memorize the answers just to get a license and get on the air. Overall, I feel all amateur exams are too short in length and do not allow for a thorough enough testing of the applicant's knowledge of radio theory. We may have more questions on operating procedures but the technical side of the service has suffered over past years.

III. Importance and Disposition of the Novice License

Due to the lack of interest in the Novice program as a whole, it is my recommendation to do away with the Novice Class license. Statistics have shown there are very few applicants taking the exam elements for the Novice license. The Novice Class would be replaced by a double entry system of No Code by entering the Technician Class, or with the passing of a code exam and a HF theory written exam, the General Class license.

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IV. Advanced Class VEs for the General Class

As a VE examiner holding an Extra Class license I have no problem getting enough examiners who have the Extra Class license to help administer exams. Since I do not have enough data to speak to this issue I do not feel it to be a hindrance to the examination system to have Advanced Class personnel administer the General Class license examinations.

V. Phasing out RACES Station Callsigns

As a member of a RACES organization, I see no reason for retaining the need for RACES station callsigns. Callsigns of special consequence no longer serve any useful purpose.

VI. Enforcement in the Amateur Radio Service

As a member of a RACES organization, I see no reason for retaining the need for RACES station callsigns. Callsigns of special consequence no longer serve any useful purpose.

VII. Telegraphy Examination Requirements

In spite of the overwhelming views and opinions of many modern amateur radio operators, I feel the Amateur Service is a service to be run by our constituents and should not be influenced by others outside the Amateur Radio service. CW is a mode that because of its narrow spectrum utilization and its application to a hostile noise environment of the HF part of the spectrum it is still a positive mode of communications for the ham radio service. The amateur service has prided itself on emergency communications and yet many speak of throwing out a mode of transmission that has a 17 dB inherent gain built in. What could be better for the HF environment?

Once an applicant wishes to move into the HF spectrum under the new method of 4-level licensing, he or she must pass a simple exam in the knowledge of International Morse. The General Class would be that entry level. That level of entry should be 5 WPM. It is only an entry level of code and that applicant would need to become more proficient when moving up to the Advanced or Extra Class of licenses.

The Advanced level should move to 10 WPM, or a doubling of the code speed requirement or the applicant entering HF at the General Class level. When moving to the Extra Class level, the applicant should be able to pass a test of 20 WPM as it is currently. Doubling the code speed each time an applicant would desire a higher class of license seems equitable.

HF communications has been core to the amateur radio operators' portfolio. Even with the newer modes of digital communications, so much of the data must contain FEC (forward error correction) that the throughput time, based on a noisy HF circuit, goes up dramatically to the point of being totally useless. CW transmission can be used right down to receiver sensitivity levels without any error correction. The message can still get through. CW is still a 'natural' for HF communications. Those being tested in the Amateur Radio Service should retain skills in the art of Morse.

VIII. Written Examination Requirements

Over my almost 40 years of being an Amateur Radio licensee I have seen many types of FCC exams, both at the Amateur and Commercial level. I have not been happy with the examination requirements of an applicant "memorizing" the answers to pass the exam. Being both an instructor and VE/CE, I have found that for example I can take a No Code applicant and in less than 8 hours have the individual pass an FCC exam. After leaving the exam room the information is not retained and another person obtains a license knowing little if anything about radio electronics theory. We have switched our position from training personnel in the radio art to giving away licenses to people who only want to push a

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button and talk. The No Code has been the least incentive license ever devised to promote people to go on to higher levels.

I am therefore recommending in the restricting of the Amateur Radio Service we return to an examination method that forces the applicants to move up to higher levels of achievement rather than just produce numbers of people who don't know (or don't care to know) radio art theory of operation. It should be a real accomplishment on the part of an applicant when he/she passes an FCC exam. The entry-level exam should be simpler, no doubt. The General, Advanced and Extra exams should be harder than they currently are. With my experience as an Amateur and Commercial operator, teacher and examiner, and engineer in the land mobile industry, I would like nothing more than to work on a committee to develop a new set of exams.

IX. Conclusions

Amateur Radio can continue to be a positive experience for people who enter its ranks and a valuable asset to our nation. I do not want to see the Amateur Radio Service become what CB radio did years ago. It is not right for anyone in the United States to basically make it so simple to obtain a license that it ruins the basic underlying foundations of the hobby. I have seen so many young people including me some 40 years ago become interested in something that was magic. That magic led to a college education in electrical engineering. Later it led on to become a Registered Professional Engineer in the Land Mobile Radio Service.

I would like to see ham radio retain some of the foundation we were founded on.....that being a continuing requirement for Morse ability. The speed requirements might need to be altered but with the positive built-in 'gain' of the CW mode for a sometimes-hostile HF environment, it would be retained. Spectrum utilization alone is maximized when using CW.

Four levels of license should be retained, named Technician, General, Advanced and Extra. Examinations should not be watered down but should be a challenge to the student rather than just a 2-day memory test to a license. All the best with the decisions the Commission must reach in this matter.

Respectfully submitted by:



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