

**DXCC**

**CALIFORNIA CENTRAL COAST  
DX CLUB**

**WAZ**



(Founded July 1, 1991)



**"AN ORGANIZATION DEDICATED TO SERIOUS DXERS"**

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**REF: FCC WT Docket 98-143**

Magalie Roman Salas, Office of the Secretary  
Federal Communications Commission  
1919 M St. N. W., Room 222  
Washington, DC 20554

November 25 , 1998

Dear Madam Secretary:

Enclosed are an original and four copies of the filing of the California Central Coast DX Club of on and behalf of our members in reference to FCC WT Docket 98-143. Diskettes have been send to MJDePoint, Public Safety and Private Wireless Division, Wireless Telecommunications Bureau, Room 8332, 2025 M Street, N. W., Washington, DC 20554 and International Transcription Services, Inc. 1231 20<sup>th</sup> Street, N. W., Washington, DC 20037.

Please contact us if further information is required.

Very truly yours

William McFarlen - **WA5VGI** President

Enclosures: FCC Filing WT Docket 98-143

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Federal Communications Commission  
Washington, DC 20554

In the matter of **COMMENTS**

	WT Docket 98-143
1998 Biennial Review	RM-9148
--Amendment of Part 97	RM-9150
of the Commission's	RM-9196
Amateur Service rules	

To: Federal Communications Commission

Comments of the **CALIFORNIA CENTRAL COAST DX CLUB**

#### 1-INTRODUCTION

I, William McFarlen - WA5VGI, President, California Central Coast DX Club, 10955 San Marcos Road, Atascadero, CA 93422-2185 (805) 466-0372, E-mail: [WMcfarlen@aol.com](mailto:WMcfarlen@aol.com) file these comments on behalf of the Club on November 25, 1998 in the FCC's Notice of Proposed Rule Making, WT Docket No. 98-143.

#### SUMMARY

We believe that:

- The Amateur Radio Service needs to be restructured.
- Six classes of Amateur Radio licenses are no longer necessary.
- The Novice Class and Technician Plus Class licenses should be phased out and the Novice Class HF CW bands should be restored for general usage.
- The entry level to Amateur Radio in the HF bands should be the General Class license.
- A change in Morse code requirements is necessary on bands below 30 MHz.
- Advanced Class operators should be allowed to administer General Class examinations.
- There is no longer a requirement for the **RACES** Licenses.
- The new FCC procedure under the Compliance and Enforcement Bureau (CIB) will work when dealing with the Amateur Auxiliary and Intruder Watch programs, and that the American Radio Relay League, in working with the Commission, will make any necessary changes to make it a viable program.
- Written examinations should be upgraded to include the digital modes and technical issues related to radio frequency exposure.
- Waivers for code examinations should be allowed only for the General Class and Advanced Class licenses and only after an attempt to pass the standard code test. Waivers should not be allowed for the Amateur Extra Class license.

We will address the aforementioned items in detail in the comments to follow and we pray the Commission will consider our comments.

Our organization, the California Central Coast DX Club, is an ARRL Affiliated Club of serious DX'ers. Among the forty members of the Club 31 are Amateur Extra Class, 6 are Advanced, one is a General and two are Technician Plus. The median experience in Amateur Radio probably is about 40 years with several over 50 years. All Full Members have confirmed over 100 DXCC Countries and 14 are on the DXCC Honor Roll (over 320 DXCC Countries confirmed). Our members come from many walks of life, airlines, flight officers, aerospace, electronic engineers, radio and telecommunications engineers, electronic technicians, radio officers on ships and shore stations; etc. The average age of our Club members is 64 years with the youngest 43 and the oldest 82. Our members operate on SSB (voice), CW, RTTY, Digital Packet Radio on VHF/UHF and on into the microwave frequencies. Our Club operates a Digital VHF/UHF DX Packet Cluster Node. Some of our members are Volunteer Examiners (VEs) and perform these activities through other Radio Clubs they belong to. We have an active Radio Interference Committee. Many of our members are active in the Amateur Radio Emergency Service (ARES) through other clubs and organizations, and in one case the United Nations Radio Readiness Group.

**OUR COMMENTS FOLLOW:**

**1-ARE SIX CLASSES OF LICENSES UNNECESSARY?**

We believe the number of licenses can be reduced from six to four:

- Technician Class (No code; privilege above 50 MHz).
- General Class (Entry level for HF; 5 WPM code test).
- Advanced Class (10 WPM code test).
- Amateur Extra Class (20 WPM code test).

Monitoring of the Novice HF CW frequencies over several months shows very little, if any, activity. However, there is activity on 28300-28500 kHz on SSB Voice for the Novice and Tech-Plus licenses. Therefore, we believe the Novice Class and Technician Class licenses can be phased out and combined with the revised General Class of license with an increase in the difficulty of the written examination.

**2-HOW IMPORTANT IS THE NOVICE CLASS OF LICENSE?**

The Novice class of license should be abolished. There is simply no need for it anymore. Applicants, given a choice, prefer the no-code path into Amateur Radio.

**3-WHAT SHOULD BE THE DISPOSAL OF THE NOVICE BANDS?**

Since there is little to no activity in the HF Novice Class CW bands we feel they should be returned to general usage for General Class and higher Classes of licenses.

**4-SHOULD THE TECHNICIAN PLUS LICENSE BE PHASED OUT?**

**5-SHOULD ADVANCED CLASS OPERATORS BE PERMITTED TO BE VEs FOR THE GENERAL CLASS?**

Yes, we believe this will benefit potential amateur service licensees by having additional Volunteer Examiners available for examinations.

**6-SHOULD RACES STATION LICENSES BE PHASED OUT?**

Yes, the emergency communications provided by **RACES** stations can be adequately provided by other Amateur Radio stations. However, some local/State administrations currently require that Amateur Radio operators providing emergency service to governmental agencies require that they belong to RACES and the Amateur Radio Emergency Services (ARES). We believe that this procedure can be revised without too much difficulty.

**7-HOW CAN THE AMATEUR AUXILIARY IMPROVE ENFORCEMENT OF THE AMATEUR RADIO RULES?**

With the new procedures established by the Compliance and Enforcement Bureau (CIB) we are confident that the American Radio Relay League (ARRL) in working with the Commission can revise their procedures with the Amateur Auxiliary and the Intruders Watch Program to benefit the Amateur Radio Service. We believe that this would not require a lot of work because many of the procedures for training already exist within the ARRL Amateur Auxiliary documents.

**8-WHAT CHANGES SHOULD BE MADE TO THE TELEGRAPHY EXAMINATION REQUIREMENTS?**

All codes tests should require one minute of error-free copy out of a five-minute code test. Fill-in-the-blanks should be eliminated. Applicants for the Amateur Extra Class codes test (20 WPM) should have the option of copying the code on a typewriter or computer, if furnished by the applicant, and in sending the code with a bug or electronic keyer. This is consistent with the FCC's Commercial First and Second Class Telegraph Licenses. We also believe, in time, the VEs will have the equipment to do this and some of them have it now. There are many senior citizens that cannot write 20 WPM in code or voice but they can type it.

We recommend lowering the CW requirements for General Class to 5 WPM, lowering the CW requirements for Advanced Class to 10 WPM and retaining the 20 WPM CW requirement for the Amateur Extra Class license. This meets the International requirements for MORSE (CW) knowledge for access to the HF bands (Bands below 30 MHz).

Waivers for the code test should be granted only for severe disabilities, and only after an attempt at the code test has been made for the General Class and Advanced Class of licenses. Waivers should not be granted for the Extra Class code test.

Although many non-amateur roles for Morse code have been

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**9-SHOULD THE CODE SPEED BE REDUCED TO 5 WORDS PER MINUTE FOR EVERYONE AS A WAY TO ELIMINATE THE NEED TO GRANT WAIVERS OF THE HIGHER CODE SPEED REQUIREMENTS FOR THE HANDICAPPED?**

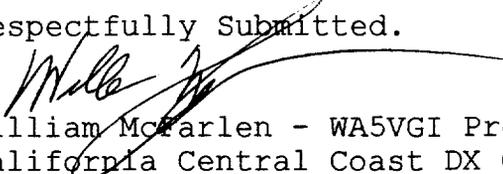
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**10-WHAT CHANGES SHOULD BE MADE TO THE WRITTEN EXAMINATIONS?**

Questions for all classes of licenses should be added to cover the new technologies, mainly digital and radio frequency exposure.

With the exceptions of the above sections the California Central Coast DX Club agrees with the Commission's intent.

Respectfully Submitted.

  
William McFarlen - WA5VGI President  
California Central Coast DX Club

cc: American Radio Relay League  
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