

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	WT Docket No. 98-143
)	
1998 Biennial Regulatory Review --)	RM-9148
Amendment of Part 97 of the Commission's)	RM-9150
Amateur Service Rules)	RM-9196
)	
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COMMENTS OF

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Summary

1. I file these comments on November 17, 1998 in the FCC's Notice of Proposed Rule Making WT Docket 98-143. I am a graduate student in the Department of Chemistry at Wayne State University, Detroit MI, and have held a Technician class Amateur Radio License (call sign KC8DQH) since 1996.

2. Amateur Radio Service licenses are divided into various classes, with greater difficulty of examination corresponding to greater frequency and mode privileges. This system of incentive licensing is the most effective way to encourage amateurs to improve their skills and knowledge of the radio art. There are, however, too many license classes and I agree with the FCC's proposal to reduce the number of license classes. The reduction of telegraphy exam requirements I propose later will allow for a reduction in license classes.

3. Telegraphy examination is one of the exams that individuals must take before they are licensed in the Amateur Radio Service. However, the rationale for telegraphy examination has been superceded by technological innovations and the exam no longer serves a useful purpose. I therefore propose the elimination of telegraphy examination for Amateur Radio Service licensee candidates to the maximum extent possible under international treaty obligations.

License Classes

4. As Part 97 currently reads, there are six license classes. One, the Technician class, does not require a telegraphy exam. The other five, Novice, Tech Plus, General, Advanced, and Extra, require

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increasing telegraphy speeds and increasingly difficult written exams to earn. The Novice and Tech Plus require a five words per minute (wpm) exam, the General and Advanced require a 13 wpm exam, and the Extra a 20 wpm exam. The written exams for Technician and Tech Plus are identical, and include the written exam for Novice. Beyond that, each license requires a more difficult written exam.

5. The frequency privilege of each license class increase as the difficulty of earning the license does. Amateur Extra class licensees have all available mode and frequency privileges, Advanced slightly less, and General even less. Novice and Tech Plus licensees have identical high frequency (HF, 3-30 MHz) privileges, but the Tech Plus has VHF, UHF, and SHF privileges identical to the Technician. Technician licensees have no HF privileges, but have VHF, UHF, and SHF privileges.

6. With proposed reductions in telegraphy examination requirements, the differentiation between classes becomes small. In fact, the Novice license has outlived its usefulness.

7. I propose the following changes: Issue no new Novice or Tech Plus licenses; current licensees should not be allowed to renew their licenses without upgrading. Restrict current Novice licensees to 100W PEP and the General class frequency and mode privileges. The Tech Plus class should also be phased out, with the current licensees having both the new Novice class privileges and the Technician class privileges. General, Advanced, and Extra class licenses should retain their current frequency and mode privileges, to maintain the incentive to upgrade license class. Technician class licensees should maintain their current frequency and mode privileges.

Telegraphy Requirements

8. Currently, applicants for Amateur Radio Service licenses must, with one exception, pass a telegraphy examination. The exceptions are applicants for Technician class, which has no HF privileges. The telegraphy examination requirement is fixed by treaty; the International Radio Regulations section S.25 requires all licensees with HF privileges to have passed a telegraphy exam.

9. In the past, the telegraphy exam requirement served a technical purpose, as the radio art had not yet progressed to the point where voice communications using amplitude modulation or frequency modulation were possible. In fact, telegraphy was the only method of radio communication possible.

10. Later in history, as the radio art advanced and voice communications became possible, the telegraphy exam came to be viewed as a filter, keeping “undesirable” operators, those with poor operating skills, from earning licenses. Current debate in the amateur community indicates that most Amateur licensees who support retention of telegraphy examination view filtering “undesirables” as the purpose of that examination.

11. There is no reason to believe that passing a telegraphy examination is an indication of good operating skills. All that the telegraphy examination indicates is the ability to copy Morse code by ear or, for handicapped applicants, by other senses. However, passing a written examination proves the applicant has theoretical knowledge of the radio art.

12. The use of telegraphy in non-amateur radio services is decreasing rapidly. In contrast to earlier in history, when most radio services used telegraphy, virtually none do today. Amateur Radio societies around the world have supported the removal of telegraphy requirements from HF license requirements. Therefore, it seems that telegraphy’s exalted status amongst modes in America’s Amateur Radio service is misplaced.

13. I propose that the various telegraphy exam requirements for Amateur Radio Service licenses be combined into a single, five wpm examination identical to the current Element 1A. Furthermore, a “sunset clause” should be added to Part 97 that will automatically remove the telegraphy requirement for Amateur Radio licenses when the International Radio Regulations section S.25 is modified to remove its telegraphy requirement.

Written Examinations

14. Currently, written examinations for Amateur Radio Service licenses cover topics such as operating procedures, rules and regulations, electromagnetic theory as applied to radio wave propagation,

electric circuit design and operation as applied to radio, and so forth. These are valid and proper topics for examination.

15. The examinations, however, are not covering topics that are at the edge of advancing the radio art, as one of the purposes of the amateur radio service. Digital modes of transmission, for example, are very popular and commercially important, yet they seem to receive short shrift in the written examinations.

16. Furthermore, with proposed changes to the license class structure and frequency privileges, it becomes important to focus more closely the written exam topics onto the information that the operator will need to know when exercising his or her privileges. For example, a Technician class licensee has very little need for knowledge of HF signal propagation, while a General class licensee must have knowledge of HF, as well as VHF/UHF/SHF, signal propagation.

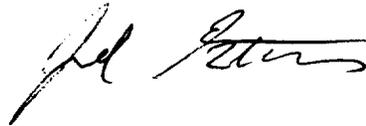
17. The complaints and petitions for increased enforcement of radio regulations indicate a problem with operators who are ignorant of or choose to disobey the regulations. This may be partly solved by increasing the awareness of the regulations amongst licensee applicants. Increasing the number and complexity of questions dealing with the radio regulations on the written exams is one method of achieving this goal.

Conclusion

18. In view of the foregoing, I propose: (1) To combine the telegraphy examination requirements 1A, 1B, and 1C into a single requirement identical to the current 1A, (2) To add a "sunset clause" to automatically reduce telegraphy examination requirements to the minimum required by International Radio Regulations, or to remove the telegraphy requirement altogether when International Radio Regulations permit, (3) To no longer issue, and to not renew, Novice and Tech Plus class Amateur Radio licenses, (4) To permit Novice and Tech Plus license holders in the meantime to use General class frequency and mode privileges with a maximum of 100 W PEP, and (5) To revise the written examination requirements to better reflect the frequency and mode privileges afforded by the corresponding license. I

am in complete agreement with the FCC's NPRM on the matters of RACES station licensing (paragraph 16 of WT Docket 98-143), on telegraphy testing for handicapped applicants (paragraph 25), on the expansion of VE opportunities (paragraph 14), and on the various rule making petitions (paragraph 31).

Submitted by:

A handwritten signature in black ink, appearing to read "Joel Stanley", written in a cursive style.

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