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November 23, 1998

FCC Secretary
Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
1919 "M" Street, N.W., Room 222
Washington, D.C. 20554

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REF: FCC WT Docket 98-143

In the matter of 1998 biennial Regulatory Review — Amendment of part 97 of the Commissions's Amateur Service Rules, FCC WT Docket 98-143:

A. I strongly urge that the Commission leave the Morse Code requirements of the Amateur Service unchanged.

1. Reducing the code requirements to 5 WPM for most of CW segments of the low bands is an obvious first step to removing code requirements totally when international rules permit it. Doing so trivializes the code requirements to the point that it will be possible to argue with justice that there is no point in the requirement, and it might as well be eliminated.

a. There already is a code free radio license — CB radio. Surely the Commission does not wish to open the much more extensive Amateur frequencies to that undisciplined environment!

b. CW radio requires less elaborate equipment than any other form and will get a message through when no other medium can. It is a valuable emergency resource and should be encouraged, not destroyed!

c. A requirement such as the CW one provides a shared experience and a bond that gives Amateur Radio an esprit de corps that binds it together in a unique way. It should not be abandoned.

d. An enlarged written exam section is not a reasonable substitute for the CW requirement — especially since, with the answers readily available, it is merely an exercise in memory.

e. Every time the ARRL has polled its membership, the sentiment has been heavily in favor of retaining the CW requirement. This time, they have avoided embarrassment by simply not taking a poll. Lowering test requirement is clearly self-serving for the ARRL, since it will presumably increase their membership.

B. I further urge that the code testing be a requirement of one minute of correct code out of 5 total. Making it a multiple choice substitutes for a meaningful test the simple requirement of memorizing the answers to questions which will be quickly made available to all. The complaint by testers that they cannot read applicant's writing is simply ludicrous. The purpose of tests is to verify the applicant's skill; not to satisfy the convenience of the Amateur examiners!

I firmly believe that the proposed changes will, in time, destroy the Amateur Service as it now exists and should be avoided. Please!

Very truly yours

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