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November 27, 1998

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

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**In the Matter of: WT Docket No. 98-143**

**1998 Biennial Regulatory Review  
Amendment of Part 97 of the Commission's  
Amateur Service Rules**

**Introduction:**

I am commenting on the notice of proposed rule making WT Docket 98-143, released on August 10, 1998. Specifically, my comments addressed the reduction of the number of license classes from 6 to 4, telegraph examination, disability credit and the written exam.

Restructuring the Amateur license classes is very emotional issue for the Amateur Community as is with all change. The American Radio Relay League (ARRL) has helped drive the direction of Amateur Radio since it's inception. As a member, I don't criticize their actions, but its hope that the Commission realizes that all ARRL members don't necessarily support their proposals or actions. It is further hoped that the Commission will put just as much weight on the many individual comments they receive as they do with the ARRL's proposal and comments. As a 35-year-old member of the League for over 20 years, this is not intended to bash the American Radio Relay, and it's hope that this introduction is not taken as such.

**Comments:**

**A. Number of License Classes**

**Paragraphs 11-12**

People tend to take the path of least resistance. The introduction of the codeless-technicians license has certainly given stock to this theory. As mentioned in paragraph 12, the applications for the Novice license has decrease dramatically. Because of the codeless-Technicians license, the Novice entry level avenue really doesn't serve much of a purpose and probably only creates a paperwork burden for the VEC's as well as the Commission. I feel that this entry level should be eliminated. I do feel that that those currently holding Novice license should be able to keep this license using slow speed and low power CW sub band.

The disposition of the novice frequencies is an issue in itself. The evolution of the digital modes has put an increased demand on the current CW frequencies. Although CW is looked upon by some as an antiquated mode of communications, all one has to do is venture down into the band to see that this mode of communication is still valued by many amateurs worldwide. In addition, during sunspot lows, this mode of communication is sometimes the only viable means of communicating. Amateurs have held a long term commitment and history of providing emergency communications during times of disaster.

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On the other side of the "spectrum", the voice modes of communications, and their more inefficient use of spectrum, has caused some crowding on the various HF bands. A restructuring along with an easing of code requirements would probably bring a large influx of new operators to the HF bands. This would further put a burden upon the current allocations. For these reasons, I feel that the current Novice frequency allocations should be eliminated as such, however, they should be split as low power voice and low power cw/digital modes maintaining the current 250W power limitations. This would serve as a subband for Amateurs who wish to experiment and communicate, but would not have to compete with higher power stations. This would further reduce the abuse of power and also the associated waste of valuable spectrum. The shrinking Novice community would be restricted to the low power CW segment or upgrade their privileges if they so wished.

### **Paragraph 13**

The technician plus class does seem to be a duplication of Novice and Technician class license. This class license should also be eliminated, however, like the Novice license, the current technician-plus license holders should still maintain their UHF/VHF privileges as well as the low power CW frequencies mentioned above.

### **E. Telegraphy Examination Requirements:**

#### **Paragraphs 19-24**

The cw topic has been a growing topic of debate. On one hand there are Amateurs who have entered the hobby through the codeless-technician avenue and on the other hand there are Amateurs who have "worked their" way up the ranks. As mentioned in paragraph 23, the Arrl's survey of both members and nonmembers, illustrates that the majority of the amateur community still believes that the CW requirement is still a valuable mode of communications.

Although this mode of communications is not used frequently, it is an asset and maybe the only viable means of communication during sunspot low or severe band conditions. Having the privilege of over 20 years in the hobby, I have seen both good as well as severe band conditions. I agree that during periods of high solar flux, voice is far superior in convey large amounts of information, however, from personal experience nothing can replace this mode of communications when conditions are poor.

The amateur radio community has also had a history of providing international good will. The cw helps eliminate the language barrier for both casual communications or communications involving distress.

Technically the cw mode allows an amateur to construct simple transmitters and receivers allowing the new segment of the population to build their technical and troubleshooting skills.

For these reasons I don't feel that the cw mode of communication can be taken too lightly. Radio amateurs are tested to be a pool of trained communications hobbyists, and change in the testing requirements must also not be taken lightly.

I believe the 3 levels of code should be decreased into 2 levels. The first exam starting at the General Class at 8-12 wpm. The ARRL's proposal of 5 wpm does not go far enough. While it is true one can communicate at slow speeds, some amateurs would probably not use the mode, and this skill would be quickly lost.

The second level of code should be at the Amateur Extra class with a code speed in the 18-20 WPM. the Extra class license holder had the pride of holding a license that required a higher level knowledge and skill. This license class still served as a level to be achieved without sacrificing privileges of the Advance, General and Technician classes. In addition it served as a pool of amateurs who were highly trained and proficient in the science and art of communication. I urge the Commission to keep the high standards that are held by the Extra class license holder. In addition I urge that the commission retain the bottom 25 kHz

spectrum they currently occupy as well as the small voice segments. This would serve as motivating factor for lower class license holders to increase their knowledge and skill.

In close agreement with the ARRL, I feel that the CW test should be altered so that it does not contain multiple choice style questions. Instead a fill in the blank style exam would be better proficiency indicator.

**Paragrah 25.**

I agree with the ARRL's view that there are abuses in the disability credit for the CW exam. However, the Commissions bring about a good point in their comment about privacy and confidentiality concerns. I question whether a physician would even release this information to an examiner. I feel that this proposal should be table temporarily until it can be studied further.

**F. Written Examinations**

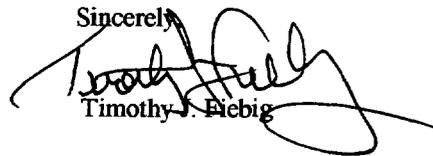
Unfortunately, in my opinion, the written examination has become an examination of how well an individual can recognize the questions from the published question pool. My comments here aren't ment to be sarcastic, but I feel in relativity most individuals take the path of least resistance and would rather study the individual questions, rather than learn the associated material. Although my comments don't deal with specific content of the written exams, I do feel that if the question pools are to continue to be public knowledge, then we should make some changes to prevent examinees from merely passing the exam by recognizing the questions from the pools..

To help prevent this, I feel that the question pools should be increased, possibly even doubled. In addition the number of questions on each exam should be increased. I also feel that an the commission should increase the percent required for a passing score. The amount of time an examinee must wait until he/she is eligible to retake the same element seems to be too short. If there were a 30 day minimum waiting period, individuals may take time to learn rather than memorize. The goal of the license program is to have trained individuals in electronic, communication theory, as well as an understanding and knowledge or the many rules and regulations and these steps would help work towards this goal.

**Conclusion:**

I agree that changes are needed in the license structure. This is a hobby that I entered as a 14 years old. At that time, I didn't find the license procedure over baring and today is far less. My friends and I back then took time to study, learn and improve our skills. There was much respect for the seasoned hams, and we also wanted to achieve the same level of technical competence. I am a believer in change when it is needed, but I am not a believer in "dumbing down" the system in order to attract quantities of individuals to maintain spectrum. The amateur community realizes that the internet is taking a large portion of individual who would probably be hams if the iternet didn't exist. Personally, I use the Internet and it is an extremely valuable and efficient means of communicating. I don't feel that decreasing the requirements nor any restructuring will encourage many of these individuals to enter into our hobby. For this reason and my comments above I urge the commission with any changes to maintain the integrity and associated pride of the Amateur licensing system. I ask you to consider my comments along with others to improve the Amateur Radio Service.

Sincerely,



Timothy J. Eiebig