

**Before the
Federal Communications Commission
Washington, DC 20554**

In the matter of the

1998 Biannual Regulatory Review
--Amendment of Part 97
of the Commission's
Amateur Service rules.

FCC WT Docket 98-143
RM 9148
RM 9150
RM 9196

To the Federal Communications Commission

Comments of :

I: Introduction

I Alfred J. Harrison, Jr of 765 E. Hilton St.; Philadelphia, PA 19134-1806; phone 215-739-7282 file these comments on November 16, 1998. In the FCC's Notice of Proposed Rulemaking, WT Docket No. 98-143.

I am a 53 year old male who holds an Amateur License K3UCA Extra Class; first licensed in 1962 as a Novice class. I also hold a Commercial General Radio Telephone license with Endorsement PG-3-19194 issued May 18, 1987. Previously I held a First Class Audio Telephone with Endorsement. I have also taught at the post secondary school level. I have worked for major corporations in electronics at posts around the globe.

I am going to comment on the following:

II: Number of License classes and outline of privileges for each.

III: Importance of Novice and Technician Plus classes and disposition of their subbands.

IV: Advanced Class VE's and testing for all classes of licenses.

V: Medical Waivers and testing them before acceptance of waiver.

VI: Changes to written exam with proposed changes to code speed exams.

VII: General and Miscellaneous Comments.

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II: Number of License classes and outline of privileges for each:

We should be able to work with three classes and one endorsement. The classes would be Technician, General and Advanced; the endorsement would be Master Telegrapher endorsement.

A: Technician-This class would remain no code VHF and higher frequency, starting at 50 MC with 250 Watt power out as measured with a watt-meter such as a thru-line inline type. This being the entry class.

B: General-The entry class HF license has all VHF plus the following HF privileges: operate all phone HF Radio Telephone Modes and Bands, operate all present CW band assignments 200 Watt average out below 30 MHZ except 20 M which will be 500 Watt average, 5 WPM code speed.

C: Advanced-1500 Watt out average, full use of all phone and CW Bands, MF, HF, VHF, UHF, SHF and beyond; 13 WPM code speed.

D: Master Telegrapher Endorsement-CW test only 20 WPM plain text or 15 WPM 5 letter cipher groups. Both tests will comprise letters, numbers and punctuation marks with usual 2 to 1 for numbers and punctuation marks. This test is like the commercial Radio Telegraph License. This endorsement is basically a vanity certificate which can be added to any HF license.

III: Importance of Novice and Technician Plus classes and disposition of their subbands.

A: The novice served a very important place in the growth of Ham Radio. It should be retired with honor after four decades of excellent service as the entry level license, along with the Tech.

B: The 5 HF novice bands for the 50 KHZ below the phone portion of the 80, 40, 15 and 10 M bands along with the first 50 KHZ of the 10 M phone bands be limited to 200 Watt average output like the 30 M band giving a group of limited to medium power max HF bands.

C: This would have many benefits including less splatter and noise, probably more DX ~~by~~ not being buried in power.

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because of them*

IV:Advanced class VE's and Testing for all classes of license.

A:With the proposed structure changes the Advanced Class will be the Senior class of license. With this they will be responsible for all levels of testing for all licenses. The endorsements will have to be given by other endorsement holders,

B:The General will be able to give the no code test as part of a VE team with all amateurs being able to help preparing the test.

V:Medical Waivers and testing them before acceptance of waiver.

A:A waiver should not be granted until the VE is satisfied that all methods have been examined and exhausted. This does not mean they were all tried but that they were considered.

B:All waivers held by extra class license will be reduced to Advanced and be limited to General Class code test on VE Team.

VI:Changes to written exam with proposed changes to code speed exams.

A:Tech should be increased to a 100 question test covering law, operating practice and VHF and UHF theory with 70 needed to pass.

B:General should be 100 questions in the test covering law, operating practice and general all band theory with 70 needed to pass.

C:A and B can share a 25 question law exam and 25 question practice exam with a 50 question specialized theory exam with a 10 question band exam, the remaining 40 questions should include present coverage plus modern digital communication methods.

D:Advanced 100 question theory exam covering all phases of amateur radio practice including CW problems.

E:Master Telegrapher no written test.

F:CW test will be 5 minutes with understandable copy for 75 seconds for general and advanced license. For the endorsement solid copy for 2 minutes of 5 minutes because of the title master.

G:Speeds will be 5 WPM for General, 13 WPM for Advanced and 15 or 20 WPM for endorsement.

VII:General and Miscellaneous Comments.

I feel the novice should be grandfathered to general with a 15 question written test, the Tech should be directly grandfathered to general due to the fact of the reverse in the past. General licenses should be grandfathered to Advanced if held before August 21, 1987 and all holders previous to the reduction of speed grandfathered with a 20 question exam.

Respectfully submitted by:



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