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Comments **FCC MAIL ROOM**  
Notice of Proposed Rulemaking  
WT Docket 98-143

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I have licensed since 1969, hold an Extra Class license, a VE active with a testing program since 1993.

#### Novice Class

I agree that there is a need to reduce the number of license classes in Amateur Radio. The entry level used by most people is the Tech License and the upgrading to Tech Plus. The time has come to phase out the Novice License. Novice or Tech Plus privileges earned should continue as long as the license is renewed. I see no reason to continue the Novice CW subbands, but instead allow them to use General Class CW subbands. The 10 meter Novice Phone subband 28.300 to 28.500 MHz should remain.

#### Code

Having a 12 or 13 WPM the minimum requirement for an HF license will be a big hurdle to getting a HF license. As a VE I have seen a lot of people come in going for 13 WPM with the idea of skipping the 5 WPM test and not make it. 5 WPM is not that hard to get, taking around 4 weeks of practice based on the classes I have taught. Unless there is some reward at this point, most people are tired of practicing code at this point. 5 WPM give you a little time to think about the character you hear, 13 WPM you hear a character and write it down as a reaction and you can think about what you are going to send. At 20 WPM you learn to hear character groups that make up words allowing you time to copy the unusually character groups.

If the Novice and Tech Plus license is eliminated for new applicants I think the General Class license should serve as an entry into HF license with a 5 WPM code test and then have the 13 WPM for the Advanced Class License. As a VE I know that code exams take a lot of time, but I think it is important to have doable steps in the Amateur license process.

#### Club Stations

This was not covered in the NPRM, I would like to see the scope of the Club Station License. I have taught Amateur Radio Classes at some of the local schools. Many have an HF station and allow students to listen to it and even talk over it if there is a licensed Amateur as a control operator. Even if the student earns a Tech license they can't operate the HF station with the control operator. I propose developing a program that would allow students to earn a Amateur Radio License in a progressively through a combination of exams and on the air experience gained by operating the club station on HF bands. The combination would cover the material required for an Amateur License. They would be instructed on basic of Amateur Radio operation and rules and pass a test then be allowed to operate the club station with the required to make 10 confirmed QSOs. The operation could be limited to just 10 meters, but this would limit the program during the low part of the sunspot cycle. It would be better if the students could club station in the General class band limits, power limited to 100 watts output. They would gain familiarity with operating procedures, class sign system, propagation, radios and antennas. This would require a waving of the CW requirement, maybe this could be done by holding the Instructor responsible for the operation of the Club Station. After they earned a Tech License they could continue to operate the Club station, at the same limits, with the approval of the instructor/trustee.

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This might provide a replacement for the intent of the Novice license. The goal would be to give students chance to experience more of amateur radio than just 2 meter FM.

#### EXTRA Class License

I like the idea of incentive licensing, its nice to have a goal to work for in the hobby. The Extra does not get that much more in Mhz compared to the Advanced upgrade. The written exam is not that hard compared to the state of the art. It does not cover Digital TV, Mpeg as an example.

I got my Novice in 69 upgraded to Advanced in 71 and in 93 I got my Extra when we started our club VE testing program. The Extra was a goal to work for and I miss challenge.