

From: Electronic Comment Filing System <ecfs@fccsun05w.fcc.gov>  
To: B7.B7(MDEPONT),FCCMAIL.SMTPNLM("j.elen@worldnet.at...  
Date: 8/26/98 3:01pm  
Subject: ECFS Reply Formal Submission of Comments by E-mail

WT DKT #  
98-143

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ecfs@fcc.gov

with a line in the message contents containing the following words:

get form your-email-address

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ECFS Received your Submission/Request at 08/26/98 15:01:43 Eastern Time

Invalid document type <DOCUMENT-TYPE> ".

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

----- Begin Included Message -----

From j.elen@worldnet.att.net Wed Aug 26 15:01:41 1998  
Return-Path: <j.elen@worldnet.att.net>  
Received: from gatekeeper2.fcc.gov by fccsun05w.fcc.gov (SMI-8.6/SMI-SVR4)  
id PAA03307; Wed, 26 Aug 1998 15:01:40 -0400  
Received: by gatekeeper2.fcc.gov; id OAA01539; Wed, 26 Aug 1998 14:58:07 -0400 (EDT)  
Received: from mtiwmhc02.worldnet.att.net(204.127.131.37) by gatekeeper2.fcc.gov via smap (4.1)  
id xma001507; Wed, 26 Aug 98 14:57:58 -0400  
Received: from john-elengo ([12.68.166.220]) by mtiwmhc02.worldnet.att.net  
(InterMail v03.02.03 118 118 102) with ESMTP  
id <19980826185658.JBIB28491@john-elengo> for <ecfs@fcc.gov>;  
Wed, 26 Aug 1998 18:56:58 +0000  
Reply-To: <j.elen@worldnet.att.net>  
From: "John Elengo" <j.elen@worldnet.att.net>  
To: <ecfs@fcc.gov>  
Subject: Formal Submission of Comments by E-mail  
Date: Wed, 26 Aug 1998 14:53:49 -0400  
X-MSMail-Priority: Normal  
X-Priority: 3  
X-Mailer: Microsoft Internet Mail 4.70.1157  
MIME-Version: 1.0  
Content-Type: text/plain; charset=ISO-8859-1  
Content-Transfer-Encoding: 8bit  
Message-Id: <19980826185658.JBIB28491@john-elengo>  
content-length: 3182

<PROCEEDING> 98-143  
<DATE> 08/26/98  
<NAME> John J. Elengo, W1DQ  
<ADDRESS1> 50 Surrey Drive  
<CITY> Cheshire  
<STATE> CT  
<ZIP> 06410-2813  
<CONFIDENTIAL> N  
<PHONE-NUMBER> 203-272-3430  
<DESCRIPTION> Comments re: WT Docket 98-143  
<NOTIFY> mdepont@fcc.gov  
<TEXT> The undersigned respectfully submits the following comments with  
regard to the NOTICE OF PROPOSED RULEMAKING - 1998 Biennial Regulatory  
Review - Amendment of Part 97 of the Commission's Amateur Service Rules,

No. of Copies made 0+1  
List #

referenced above.

1. Maintain the incentive licensing scheme to encourage improvements in technical know-how and keep standards high, but remove any CW proficiency requirement from it.
2. Unless forced by international Radio Regulations, do not conduct any CW proficiency examinations. If forced, then set a 5 word per minute limit for all.
3. Continue to restrict the use of telephony to only certain portions of a band.
4. Continue to provide for progressively greater frequency range utilization within a band to those possessing a higher class of license.

Rationale:

The FCC should continue to encourage improvement in an operator's technical proficiency according to an incentive licensing scheme. Operators possessing a higher class of license should be provided with progressively more operating privileges. However, it is not necessary to include a CW proficiency consideration in the scheme. This is because CW proficiency is self-regulating and therefore does not require an intervention by government other than to set aside a non-telephony portion of the band to accommodate its use.

Without attaining an initial proficiency, CW communication is not possible. The mere fact that one can achieve a CW two-way communication on the air constitutes a sufficient demonstration of that person's ability to send by hand and receive by ear.¶ Furthermore, there is no guarantee that an operator's proficiency would be maintained after an examination has been passed. However, if the specific language of the international Radio Regulations insists upon a CW proficiency examination for licensing, then a 5 wpm level should be sufficient for all.

CW remains an important part of the amateur radio hobby despite the availability of advanced modes of digital communication. CW does offer a low cost method of radio communication and it is very bandwidth efficient. CW techniques also facilitate international communication without the need for foreign language skills, worldwide.

The FCC should continue to restrict the use of telephony to only a portion of a band so as to facilitate efficient CW communication elsewhere, that amount being dependent on usage and other considerations.

Respondent's Background:

I have been licensed since 1956 and have held an Amateur Extra Class license since 1968. I passed a 20 wpm CW proficiency examination in a FCC office at that time. I operate primarily using CW. Many of my contacts are generally conducted at a speed level of over 20 wpm. My main interest in the hobby is communicating with international amateur radio stations around the world. On few occasions, I also use telephony.

Signed:

JOHN J. ELENGO, W1DQ

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