

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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DEC - 7 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

WT Docket No. 98-143

RM-9148

RM-9150

RM-9196

In the Matter of  
1998 Biennial Regulatory Review -  
Amendment of Part 97 of the Commissions  
Amateur Service Rules

### Comments Of

#### I: Introduction

I James H. Isom, WB9LQX, 1203 Broadmoor Dr., Bloomington, IL 61704, file these comments on November 27, 1998 in the FCC's Notice of Proposed Rulemaking, WT Docket No. 980143. I am a licensed Amateur Radio operator since 1973, with an Extra class License and a Volunteer Examiner (VE) with W5YI and the ARRL.

#### II. Number of Amateur Service License Classes

There should be no more than four (4) classes of Amateur License Classes. These classes would be; Technician, General, Advanced and Extra. The Technician Class License would be the entry into Amateur Radio with the no code provision, as is already the requirement. The General Class License would be the entry into HF.

#### III. Importance and disposition of the Novice Class

It is obvious that the Novice License has outlived its usefulness. The majority of amateurs entering the Amateur Radio Service are of the Technician Class License, therefore the Novice Class License could be eliminated.

With the elimination of the Novice Class License a moratorium could be placed on this class with no renewals when the license expires. This would mean a maximum of ten (10) years for the complete elimination of Novice Class Licensees. During this period there would be no changes in operating privileges for the present Novice class licensees or changes in the rules that govern those portions of the bands that are presently assigned to the Novice Class of Licensee.

#### IV. Advanced Class VEs for the General Class code tests

Allow the Advanced Class Licensees, that are VEs to administer the General Class code tests. The Advanced Class Licensees have successfully passed the General Class code test and are therefore qualified to administer this code test. All tests given by VEs must be signed by at least three VEs and therefore all items are double checked.

#### V. Phasing out RACES Station Callsigns.

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**WT Docket NO. 98-143**

**James H. Isom**

In view of the fact that no new RACES station licenses have been granted since July 14, 1980 it is obvious that a RACES station license is no longer a vital requirement.

#### **VI. Enforcement in the Amateur Radio Service**

Enforcement of any activity is an ongoing problem. All procedures must be within the law and must have the backing of a legal entity. I do not know the answer to this ongoing problem. It could be the Amateur Communities job to discuss with any offenders what the legal consequences of their activities could be and to refer all offenders to the Amateur Radio Auxiliary.

#### **VII. Telegraphy Examination Requirements**

With the elimination of the Novice Class License and the continuation of the no-code license it is obvious that some change must be made to allow potential General Class Licensees the opportunity to use the HF bands and still be such that the individual has the feeling of accomplishment. Therefore I am suggesting 7 WPM for General Class and 12 WPM for Advanced Class. The Extra Class would have no additional code requirement.

#### **VIII. Written Examination Requirements**

The written examination requirements for the Technician, General and Advanced Class licenses could remain as they are today. The Extra Class license should be updated to make the test much more difficult. It could include all the items covered in the present exams and include items dealing with digital technology.

#### **IX. Conclusion**

- Expired licenses - No credit given for expired licensees (pre-1987, Element 3B; pre-1991, Element 1A.) If these individuals have a desire to reenter Amateur Radio they would enter as a Technician Class Licensee or as a General Class Licensee.
- Eliminate the Technician Plus Class License. These licenses would remain in effect until expired with all privileges as they have at the present time.
- Leave the portions of the Novice Band at 200 watts. The majority of communications can be conducted with less than 200 watts. The lower the power, the lower the chance of RF exposure. It is also the goal of most amateurs to conduct communications at the lowest power level that will complete the transmission in a satisfactory manner.
- Do not lower the requirements to a point where we are "dumbing down" the amateur Radio service. We have gone through phases in our schools where everyone must graduate whether they passed the subjects or not. Now many colleges and businesses are conducting courses to bring students, and employees up to the standards that will result in a productive person.

I have been in the Boy Scouts of America for over 50 years. Only 2% of the boys that join Scouting achieve the rank of Eagle Scout. All boys that join want to achieve the rank. The requirement for Eagle is still 21 merit badges, as it has been for at least 50 years. The required

**WT Docket NO. 98-143**

**James H. Isom**

badges have not changed, if any thing some of the requirements for these badges have been made even more stringent.

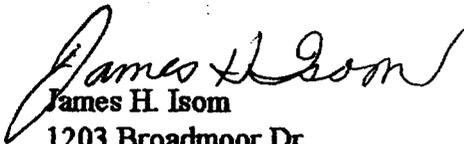
It must be remembered that if we want to belong to an organization we must abide by the rules of the organization, pass the requirements and be active. The only one we do not have control over in Amateur Radio is being active.

It is imperative that we keep the requirements for participation in Amateur Radio so that those that really want to enjoy the hobby, participate in public volunteer work that involves Amateur Radio, and are a credit to our country on the air waves will continue to participate.

Over the past several years there has been numerous discussions that the code test should be eliminated because it is no longer relevant. There are a number of subjects that High School and College students study that are not relevant to the career they are pursuing. The study of these courses is to broaden their knowledge and make them better citizens in the community. The same is true of the code test in Amateur Radio.

If we are only going to test on what is relevant for the operation of an Amateur Radio station we would only need to test on the items that pertain to the FCC Rules and Regulation. This is due to the fact that most Amateur radio equipment today is per-manufactured and very little is built. This obviously is not the correct way to go either.

Submitted by:



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