



# W9AWE

## Western Illinois Amateur Radio Club

P. O. Box 3132

Quincy, IL 62305-3132

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November 4, 1998

DEC 1 0 1998

FCC MAIL ROOM

Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
1919 M Street, N. W.  
Washington, D.C. 20037

Re: WT Docket 98-143

Ms. Salas;

Please find enclosed an original and 10 copies of Comments to be filed in the above proceeding for the consideration of the Commissioners of the FCC. These Comments are being filed on behalf of the members and officers of the Western Illinois Amateur Radio Club Incorporated of Quincy, Illinois.

Additionally, as required, we are filing these comments in WordPerfect 5.1 format on diskettes with the following agencies under separate covers: Public Safety and Private Wireless Division, Wireless Telecommunications Bureau, attention to M. J. DePont, and with International Transcription Services, Incorporated.

Thank you for your prompt attention and proper handling of these documents so that they may come before the Commissioners in a timely manner for their consideration.

Respectfully,

Beverly Hamilton, KB0VJF

Secretary

encl

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1998		1998	
Bartlett, Carol 1174 Rogers Street Barry, Illinois	WA9EFV  62312	Beers, Harvey RR 7, Box 57 Quincy, Illinois	N9OAK  62301
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1998		1998	
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Cripe, Dave RR#2 Box 263 Camp Point, Illinois	KC3ZQ  62320	Crockett, Bob 1923 South Sheridan Drive Quincy, Illinois	N9KUT  62301-8978
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Finney, Dale 708 South 14th Street Quincy, Illinois	WB6FWX  62301	Fisk, Ron 1529 South 30th Street Quincy, Illinois	W9NOO  62301-6307
1998		1998	

Freeman, Walter 1601 South 24th Street Quincy, Illinois 1998	N3OWI  62301	Frey, Richard 61255 Feruson Road Bend, Oregon 1998	K4XU  97702-95610
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Funk, James RR #1 Box 151-A Liberty, Illinois 1998	N9JF  62347	Garner, Cork RR 1, Box 19 Monticello, Missouri 1998	KC0DVX  63457
Gross, George 8 Raymar Court Quincy, Illinois 1998	KD9KB  62301	Halpin, George E. 1201 Pringle Heights Pittsfield, Illinois 1998	WD9DDO  62363
Hamilton, Bev 912 White Street Canton, Missouri 1998	KB0VJF  63435	Hamilton, Jerry 912 White Street Canton, Missouri 1998	KN0I  63435
Harper, Bill RR#1 Box 175C St. Joseph Road Quincy, Illinois 1998	N9IL  62301	Hayes, Joe 1013 Lind Street Quincy, Illinois 1998	KB9TBX  62301
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Huie, Joe 1910 South 30th Street Quincy, Illinois 1998	K2PEY  62301	Ireland, Matt 1213 Kochs Lane Quincy, Illinois 1998	KB9SEJ  62301-1133
Irvin, Troy RR #3, Box 65 Liberty, Illinois 1998	KB9SWB  62347	Jackson, Randy 7304 North Eastern Avenue Kansas City, Missouri 1998	N9REY  64119
Kennedy, Kevin 47 Granview Quincy, Illinois 1998	N9KXM  62301	Kurfman, Gary 1920 State Street Quincy, Illinois 1998	KB9SWC  62301

Lenane, Mike 717 North 15th Street Quincy, Illinois 1998	KB9SEK  62301	Lile, Ron 2822 Woodside Drive Quincy, Illinois 1998	K0RL  62301-6325
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McNutt, George 606 East Wood Street Camp Point, Illinois 1998	WA9CIX  62320	Mendenhall, Geoff 2830 Cabot Road Quincy, IL 1998	W9NEZ  62301-6273
Mensendike, Richard P.O. Box 371 Camp Point, Illinois 1998	WB9JQW  62320	Meyer, Robert H. 2006 College Avenue Quincy, Illinois 1998	WA9UAA  62301
Moorman, Larry E. 217 West Union Street Mount Sterling, Illinois 1998	WA9BBK  62353	Morrison, Bill 2000 Grove Avenue Quincy, Illinois 1998	N9UPG  62301-4334
Mullin, Keith 23 Wilmar Drive Quincy, Illinois 1998	KB9JST  62301-6820	Myers, Andy 1222 South 30th Street Quincy, Illinois 1998	N9XEO  62301
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Williams, Dave 2535 Cherry Street Quincy, Illinois 1998	KB9FIN  62301	Williams, Doug 1717 South 28th Street Quincy, Illinois 1998	KD9Q  62301-6305
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1999

KB9TGY  
62347

Before the  
Federal Communications Commission  
Washington, DC

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Comments Submitted in the Matter of )  
 )  
Simplification of the Rules Governing ) WT Docket No. 98-143  
The Amateur Radio Service )  
 )

Comments submitted November 4, 1998 on behalf of the Officers and members of the Western Illinois Amateur Radio Club Incorporated, a Corporation chartered under the Fraternal and Not-for-profit Incorporation Laws of the State of Illinois. The WIARC may be contacted at P. O. Box 3132, Quincy, IL 62305-3132

To the Commissioners:

## I. INTRODUCTION

1. The Western Illinois Amateur Radio Club, based in Quincy, Illinois, first organized in 1940, presently has a membership of over 80 licensed amateur radio operators. All six classes of license are represented among its members who range in age from sub-teen to 80 years plus.
2. Having a vested interest in the health and future growth of the Amateur Radio Service, the members of the WIARC would like to offer the following comments and recommendations in the matter of Docket 98-143.

## II. SUMMARY

3. At a recent meeting of the general membership, it was voted overwhelmingly, that in the opinion of members, the present license structure and system of examination serves the Amateur Radio community quite adequately. None the less, the membership also recognizes the need for FCC to reduce complexity and to streamline the rules governing the Amateur Radio Service. As a result and in response to Docket 98-143, the members of the Western Illinois Amateur Radio Club would like to offer comments and alternatively propose that the Amateur Radio Service rules be modified as follows;

- Reduce the number of classes of Amateur Radio license from 6 to 5 by eliminating the Technician Plus License.
  
- Retain the Novice Class License in its present form and with its present privileges.
  
- Allow present and future holders of the Technician Class License to simultaneously hold the Novice Class License (and visa versa) with concurrent terms and enjoy the privileges of both license classes under a single callsign.
  
- Modify the FCC enforcement program to enlarge it to include greater participation of trained volunteers who are certified in an FCC enforcement program through an approved training course and are protected by statute from personal liability and action.
  
- Retain the present three-tiered telegraphy proficiency examination system with examination at the levels of 5, 13 and 20 words per minute.

### **III. DISCUSSION**

#### **A. Number of License Classes**

4. The Amateur Radio community is generally in favor of any effort by the FCC to reduce its workload and improve its efficiency in handling amateur radio matters. However, any change to the rules governing the Service must be done not only with efficiency and reduction of paperwork in mind, but must also be balanced against the resulting effects on the health and future growth of the Service. Any change that considers only the former and ignores the negative effect upon the latter cannot be deemed acceptable by the Amateur Radio community.

5. Since the introduction of the Novice Class License in the early 1950's this license represented the easiest and most popular entry path into the Service. This remained true until the introduction of the code-free Technician class license nearly a decade ago. The Novice license allows entry into the hobby to anyone willing to demonstrate a fundamental knowledge of the rules and regulations, operating practices and radio theory. The code examination is very basic at 5 WPM and nearly anyone willing to spend a few evenings of practice can pass this examination with little difficulty.

6. With the introduction of the code-free Technician License many candidates for a first license now choose this path in preference to the Novice License due to the lack of a code proficiency requirement. This is despite the more difficult written examination requirements. The figures quoted in the NPRM bear out this shift in popularity. However, among early and pre-teen candidates the Novice Class license is still the most viable entry path. We state this based upon our own experiences gained through the annual introductory classes the WIARC conducts each year. Typically there are several pre-teen candidates in these classes and they invariably struggle with the terms and concepts addressed in Element 3A. Additionally, local Volunteer Examiner teams during the process of administering examination sessions have observed a significantly lower success rate among pre-teens taking Element 3A as compared to older candidates who take the same element. We believe that the lower success rate of this age group is primarily due to the inability to comprehend the terminology and concepts presented in the materials which form the basis of examination for Element 3A.

7. While the figures quoted by the FCC in the NPRM do indicate the great disparity between the numbers of new Technician and Novice licensees, we believe one very important factor is being overlooked which bears upon the question of retention of the Novice Class License. What is not considered in these numbers is the number of Amateurs who enter the Service with a Technician Class License and who upgrade to the Technician Plus Class License in order to gain the privileges of HF operation. These Amateurs realize that the key to upgrading to the General Class License is on-the-air operation and there is little opportunity for that on the VHF/UHF bands. The Technician Plus License is in effect a combination of the Technician and Novice Class Licenses. This is true both in terms of

examination requirements and privileges earned. In reality these Amateurs are using the privileges of the Novice License as a tool to gain on air HF experiences and knowledge and increase telegraphy skills through on-air, real time use of the telegraphy mode.

8. Considering the proceeding factors, the elimination of the Novice and Technician Plus Licenses would have several very negative effects upon the future of Amateur Radio in the United States. First, without the Novice Class License, younger candidates who cannot comprehend the materials covered in the elements beyond Element 2 would, in effect, be denied entry into the Service. Without the Novice License and Technician Plus Licenses the minimum level of telegraphy examination speed needed to gain HF privileges would be that of the General License. Presently this is the 13-WPM Element 1B. In our opinion this would be a serious error in terms of the future growth of HF activity. It is relatively easy to gain telegraphy skills sufficient to pass the 5-WPM (Element 1A) examination through classroom instruction and by listening to pre-recorded code practice materials. Attaining the necessary skill level in order to pass the next level of examination at 13 WPM (Element 1B) is much more difficult. Historically these skills are most easily gained only through on-air experience and actual use of the telegraphy mode. Attaining a skill level consistent with passing Element 1B is an much more difficult task if attempted through passive activities such as listening to code practice materials and through classroom instruction. We believe that a great many of those who have recently entered the Amateur Radio Service through the Technician License and eventually upgraded to General License and beyond did so by first upgrading to the Technician Plus License. The HF privileges thus gained are the key tool then used by the licensee to ease the process of upgrading from the Technician Plus License to the General License. Without the opportunity to use what are in effect Novice HF privileges gained in this manner, the Technician Licensee would then be faced with the problem of gaining telegraphy skills through passive means or the minimal on-air opportunities available on the VHF/UHF bands.

9. Thus, we conclude, a license structure with the entry level telegraphy examination at the General License level would in our opinion prevent a majority of entry level candidates from ever attaining HF

privileges. We believe this would remain the case even if the General Class Telegraphy examination (Elements 1B) was administered at slower speed, even as slow as 10 WPM. Indeed, the overwhelming majority of the membership of the WIARC feel that the present license structure and examination system have provided a good basis for healthy growth and incentives for new licensees to aspire to higher levels of license class, rewarding them with new privileges commensurate with skills learned.

10. After considering all of the preceding factors as well as the Commissions' desire to reduce the number of license classes, we would like to offer the following alternative. In an attempt to retain the ease of entry to the hobby now embodied in both the Novice and Technician Licenses, we propose that only the Technician Plus License be eliminated. In the absence of the Technician Plus License we also propose that the rules be changed to allow a FCC licensee to simultaneously hold a Technician License and a Novice License. The term of one license to coincide exactly with the other and with one callsign to be issued covering the privileges of both licenses. This presents no difficulty at this time as the pool of 1X3 General/Technician Class callsigns has been exhausted and both are now being issued callsigns from the Novice Class callsign pool.

11. The practice of simultaneously holding Technician and Novice Class Licenses is not new. It was at one time in the past an acceptable practice under FCC rules. We are suggesting that this practice again be allowed as a method of realizing the goals set forth in the NPRM (minimizing the number of license classes) while eliminating the negative effects on the future growth of the Service.

12. We realize the FCC had the goal of simplification in mind when the proposals of this NPRM were made. However, we feel that the necessary burden of maintaining the records for 5 classes of license Vs 4 classes is actually quite minimal. No matter the class of license held, the FCC must maintain a separate record for each licensee. Using modern relational database software, the complexity and contents of each record is not a large factor in managing the data once the program is successfully configured and the records are entered. With the licensee data managed under a modern database program, the greatest burden in terms of the number of different license classes comes only at the time

of data entry. We feel this is a minor issue compared to the health and future growth of the Service. Additionally, as we see it, the Volunteer Examination Coordinators and the Volunteer Examiner teams are now handling the majority of the paperwork relating to the examination process and the issuance of new Amateur licenses. In fact, we believe that the Volunteer Examiner Coordinators already convert into electronic record format much of the data presently handled by FCC. If this is not in fact the case it certainly should be a goal using today's technology. Thus we question if there is anything close to a balance between the negative effects of the changes detailed in Docket 98-143 with the benefits to FCC in terms of paperwork reduction, streamlining, and cost reduction.

13. We would also like to point out an added benefit to the proposal outlined above. The Commission along with the Council of Volunteer Examiner Coordinators and its' member organizations have spent a great deal of time and resources to create the excellent system now in place which provides for examination opportunities. This proposal as we have outlined it would require little if any modification of the existing library of study and examination materials. Also, it would allow the Volunteer Examiner program to proceed without an extended period of reconfiguration and the great effort which would be required if rule changes dictated creation of new test elements, materials and syllabus.

**B. Providing greater opportunities to volunteer examiners to participate in the examination process.**

14. We agree with the proposals set forth in Docket 98-143.

**C. Elimination of the Radio Amateur Civil Emergency Service.**

15. We agree with the Commission that under emergency conditions, all necessary communications can be carried out by other FCC license holders, primary, club and military. Further we believe that there is little understanding among the present Amateur community of the purpose and background of

RACES. There are limited active RACES groups in the United States and they operate very much in parallel with other volunteer Amateur organizations such as the ARRL sponsored Amateur Radio Emergency Service.

**D. Improvement of FCC enforcement of the existing rules governing the Amateur Radio Service.**

16. The problem of enforcement on the Amateur frequencies is an issue that is in critical need of resolution. The lack of effective enforcement has continued for a much too long a period of time. This coupled with the recent rapid growth of the Service in the United States has created a problem of ever increasing magnitude. This is especially true in the HF bands but increasing incidents of interference and unacceptable language and behavior on the VHF/UHF bands indicates the increasing problems there also.

17. One factor complicating any solution is the lack of resources within the FCC and the limited budget under which it operates. Little more than a decade ago similar resource shortages were impacting the availability of examination opportunities before FCC examiners. That problem was resolved through the cooperation of the FCC and the amateur community itself. Today a quite successful program utilizing volunteer examiners serves the amateur community with literally thousands of examinations given annually with few problems. We believe a similar cooperative is possible in this case. Two issues have inhibited an effort of this nature in the past. One is that in the past, volunteers participating in enforcement activities and any data they may have gathered, have little standing in the legal aspect of any resulting enforcement process. This must be remedied for any volunteer program to be successful.

18. The second area that has been a stumbling block to any volunteer activity is the lack of protection from civil action for issues related to their voluntary activities. Several attempts have been made to pass legislation in Congress to address this issue. Until it is resolved and volunteers in this program as

well others such as the Volunteer Examiner program will continue to have reservations regarding their participating. The FCC must take an active lead in seeing that this legislation proceeds through the Congress at the earliest opportunity.

19. Once the problem of indemnification has been resolved, members of WIARC believe that FCC should establish a corps of certified volunteer observers. These volunteers would be certified to gather data and passively develop information that could be used by FCC in the enforcement process. The certification process could be carried out by organizations approved by FCC for this purpose with the costs borne by the volunteer. Once certified, these observers could play a large role in gathering information and evidence that could be used in many minor enforcement proceedings. This would release the critical FCC resources needed to handle the more serious problems. Right now the Amateur community in general views FCC as being impotent when it comes to 'cleaning up the bands'.

**E. Competence level for telegraphy examinations and written examinations.**

20. Telegraphy has been a part of Amateur Radio since the dawn of radio itself. Indeed this mode still enjoys great popularity within the Amateur community despite the fact that commercial communications and military systems have moved to other modes. In order to successfully operate and enjoy the telegraphy (CW) mode requires an Amateur possess a minimal knowledge and skill set before attempting on-air operation. To attempt on-air operation without these minimal skills would cause great disruption to others operating this mode.

21. The fact other services have abandoned the telegraphy mode does not diminish the enjoyment many Amateurs get from operating this mode. Most importantly we believe that the telegraphy mode is important in terms of teaching discipline and proper operating techniques. In fact we feel that it is the initial experiences in the Novice CW segments for new Novice and Technician Plus Amateurs that instills the high standards of conduct usually demonstrated throughout the remainder of their Amateur careers.

22. One of the stated purposes for the existence of the Amateur Radio Service is for 'technical investigation'. At one time most Amateurs built all of their own equipment, receivers and transmitters in particular. With today's high performance standards for voice mode equipment, it is not practical for most Amateurs to build equipment for these modes. However, a CW or telegraphy transmitter or receiver is still a practical project to attempt as learning and training experience. To actually build such equipment and use it on the air provides enjoyment as well as practical training for many Amateurs. We believe it is important to the health of the Service to encourage this activity.

23. When the Incentive Licensing Program was introduced to the Amateur community in the 1960's it was explained that the system was designed to encourage each Amateur to acquire additional operating skills and technical knowledge. The rewards for demonstrating these skills and knowledge through examination were additional operating privileges and operating spectrum. This policy has prevailed for over 30 years has resulted in good growth and health within the Service. The changes proposed in Docket 98-143 would in effect dismantle much of that system and the members of the WIARC believe that this will result in a diminished service populated by users with much lower skill sets and this would do much harm to the prospects for its' future growth.

24. The members of the WIARC feel that the CW or telegraphy examination should remain a part of the overall examination process and that the present levels of examination are appropriate given the additional privileges and additional spectrum gained at each level.

Respectfully submitted on behalf of the officers and members of the Western Illinois Amateur Radio Club,

*Darell W. Taylor*

Darell Taylor N9DT

President, WIARC