

To: ecfs@fcc.gov
CC:
BCC:
Subject: Comments on 98-143

DO NOT FILE OR ORIGINAL

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DEC 11 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

<PROCEEDING> 98-143
<NAME> Phil Florine
<TEXT>

Dear FCC,

I am a VE and a 39 year ham. I feel 98-143 is really about making it easier to become a ham. Maintaining more, smaller databases at the FCC isn't any harder than maintaining fewer, larger ones. Giving a few fewer different tests isn't relieving any burden on VEs. It wasn't a burden in the first place. It's what we do. Costs aren't really an issue in either case.

I want to maintain the integrity of ham radio. If you really have to WORK to achieve something, that something is more respected and valued. Some of what you are considering will lower the bar. I request that every individual having anything to do with 98-143 decision making spend a couple hours listening to approximately 26.8 to 28.1 MHz when that spectrum is open. Then, think about the consequences of lowering the standards and privilege giveaways. (QST, July '98, p. 22 shows two four-year old kids. ONE EARNED TECH PERS, ONE EARNED LICENSE!)

In paragraph 20, you talk about the no-code tech license and attracting technically inclined persons. Well, where I live, it didn't work. You got primarily non-technical types, many of whom were tired of what 11 meters (formerly OUR band) had become. Further lowering of the bar still won't attract the technically inclined.

I don't want to see the CW requirements reduced any more than they already have been (by multiple choice testing). 20 is now effectively 17, 13 about 10, etc. Get rid of multiple choice testing and require one minute of solid copy. If you want, give the Extra phone band to people who can't pass 20 wpm, but leave the Extra CW bands to the competent CW ops. The worlds of DX and meaningful ragchews just begin to open up at 20 wpm. Add another 20 wpm and it REALLY becomes exciting and more useful.

Regarding CW as a necessary mode, I refer you to April '98 QST, "It Seems to Us", by David Summer, secretary of the ARRL. The article, "The Joy of Morse", describes CW's many advantages not only on HF, but above. One paragraph, especially, stands out and I believe to be true: "Finally, if you read our mail you would be forced to conclude that amateurs who operate CW must enjoy Amateur Radio more than others. Complaints about rude behavior, inappropriate language and jamming almost invariably involve voice (and occasionally packet) modes, almost never CW." In addition, what other mode could I use to ragchew for hours with stations I can hardly hear on 40 and 20 meters with 100 watts and a vertical? On what other mode may I successfully use two 250 Hz filters in cascade and even narrower DSP to improve communications when the band is crowded? Spectrum will even be at more of a premium if we get tons of new hams. Already, most hams I know won't even consider using 20m SSB on weekends unless they have a KW and a huge antenna at 70 feet.

Regarding the written tests, I feel this is an opportunity to fix a big problem. What integrity is there in a multiple choice test that allows the test questions and all four answers to be given exactly as published in a "study guide"? If multiple choice has to be used, make it conform to academically accepted testing methodology. I know many hams who have memorized their way into ham radio as far as Extra. They know absolutely no "theory". (I had a guy whom had just passed his FCC commercial GENERAL test ask me how to tell which wires on a 24v power transformer should be connected to 110v! This test uses the same multiple guess system as amateur radio theory tests do. He just memorized the answers! He needed the license to work on aviation equipment. Scary thought!)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

In the Matter of)	WT Docket No. 98-143
)	
1998 Biennial Regulatory Review --)	RM-9148
Amendment of Part 97 of the Commission's)	RM-9150
Amateur Service Rules.)	RM-9196

Comments

By Anne K. Fanelli, WI2G
541 Schultz Road
Elma, New York 14059
(716) 652-6719
e-mail <mox@buffnet.net>

I am an amateur Extra Class licensee and a VE with the ARRL and W5YI VECs, and there are several aspects of the proposed Part 97 rewrite which are of deep concern to me--specifically, those pertaining to telegraphy. In my opinion, there is a continued need for proficiency in International Morse telegraphy as a backup to satellite and automated terrestrial communications systems for distress and safety communications. Watt for watt, Morse is the most effective communications mode yet devised and particularly important during meteor showers and geomagnetic disturbances, which can wreak havoc with satellite communications and digital-mode throughput. In addition, the narrow bandwidth of Morse signals helps to conserve spectrum space, thus allowing the same number of amateurs to occupy a smaller band allocation. Many, if not most, amateurs are interested in building (or at least maintaining) their own equipment, and Morse transceivers are simpler in design and layout than transceivers utilizing other modes. On a personal level, there is the *uniqueness* of Morse communication in amateur radio. If I want to talk to someone, I can pick up the telephone more easily than by obtaining an amateur license. If I want to type to someone, I can do so over the Internet *much* more economically than by setting up a transceiver and wireless modem. But Morse telegraphy, for most of us, is unique to amateur radio--an avocation which offers an increasingly-rare opportunity to truly participate in technology (beyond programming a VCR!).

This being the case, however, there is certainly room for simplification of the amateur license-class structure and testing requirements. I agree, reluctantly, that the Novice and Technician-Plus licenses can feasibly be eliminated, and RACES licenses discontinued because of the overlap in function between RACES and the Amateur Radio Emergency Service. Current Novices should be allowed to operate Morse with 200 watts output anywhere within the 80, 40, 15 and 10 meter bands and the current Novice subbands should be reallocated only to narrowband operations (Morse and digital modes). Morse requirements could be simplified to 10 words per minute for the General license and 18 wpm for the Extra Class. VEs should be continued to be allowed to determine how to test for code speed. However, I concur with the ARRL proposal to require VEs to attempt the higher-speed Morse

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examination for applicants with disabilities, because of the wide latitude allowed in testing and the abuses which have already occurred in this area.

In the area of enforcement, I believe that the Amateur Auxiliary's function should be separated from the ARRL, to allow the majority of amateurs--who are *not* associated with the ARRL--greater participation in the enforcement process. Appearances to the contrary, the ARRL does not speak for the majority of amateurs.

As for the written-examination process, I believe that the current list of topics covers current technology and contemporary amateur operating practices fairly well and no major changes are needed. I would like to see, though, a greater emphasis placed on station design, troubleshooting skills, and maintenance to counteract the current trend toward amateurs as "appliance operators."

In conclusion, while I am far from certain that a drastic overhaul of Part 97 is necessary, much care and consideration is required to avoid mere change for change's sake or the illusion that all change is constructive.

INT DECKET # 28-173

11-22-98

Commissions Secretary
Magalie Salas
Office of the Secretary
F.C.C. 1919 M Street N.W.
Room 222
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Secretary,

It is time that the F.C.C. takes action to change the classes of amateur licenses. In to-days fast moving technology there is no need for F.C.C. to handle the large amount of paper work now required to license amateur radio operators.

By holding up code speed requirements beyond (5) five words per minute , we are turning off many young people who are already into computers and possess keen minds , who could further amateur radio and the communication field. Add some more theory to the examination and allow advanced license examiners and General license examiners to perform the work of examining these young minds. Lets get those young persons into Amateur Radio Service.

Sincerely,

Bruce K. Senior

KABPGY

183 HILLSIDE DR.

DALTON, OH. 44618

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November 30, 1998

D.W. Stanley, III
420 E. Locust Street
Angleton, Texas 77515
(409) 849-6207

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DEC 11 1998

Magalie Roman Salas, Esq.
Office of Secretary
Federal Communications Commission
(202) 418-0232 FAX

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OFFICE OF THE SECRETARY

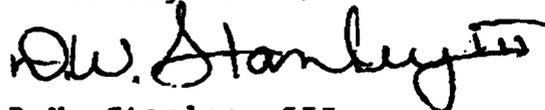
In The Matter Of: WT DOCKET 98-143

Dear FCC Commissioners;

I do not think that it is right to force people who have no interest in CW to have to learn it in order to have privileges on the HF frequencies. When I was studying to become a Novice, I learned the importance of CW and the history of Amateur Radio. However, we are fastly approaching the year 2000 and I feel the code should be available to those people who want to use it, but not be forced on those of us who don't.

Thank you for your time and consideration to this matter.

Sincerely Yours,



D.W. Stanley, III
Amateur Radio Operator
NSXDT

DWS/cs

cc: W.E. KENNARD
SUSAN NESS
H.W. FURCHTGOGT-ROTH
M.K. POWELL
G. TRISTANEY

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WT DKT # 98-143

From: Donn Hilton <donn-hilton@home.com>
To: B7.B7(MDEPONT)
Date: 11/28/98 1:52am
Subject: Morse code reqt for HF

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Maurice

I was just reading over a document about proposed changes to HAM licensing for the future. I am a Canadian HAM and have my no-code license with "advanced" classification. I'm involved with emergency preparedness and with scouts and that is why I bothered getting a license at all. There are a ton of people like me who really don't absolutely need a code endorsement, we can sort of get by without it but it would be best for the community if we could go HF if need arises.

What I propose is that the code requirement for HF be abolished but that if one wishes to use code that they have to be certified before they can use it on the air. There are lots of us who would like to eventually have that code endorsement. There are pieces of satellite bandwidth that dictate we only use code plus CW is the cheapest way to communicate with the simplest of equipment for relatively long distance.

All major marine companies have now dumped the need for morse operators on the ships and I expect that most military will do the same. They are better off with spread spectrum encrypted transmissions of voice and data. The basic need to provide bandwidth to HAM radio people is so that the populous has a trained communications resource in time of disaster. Why cut it back with needless restrictions that no longer make a lot of sense.

When I went to school there were a bunch of us that were interested in communications and electronics. The same people in school now are more interested in computer technology. The point I'm trying to make, still, is that your resource of potential hams is reducing so changes will have to be made to encourage people to get on the air.

I would like to reiterate that I am not in favour of removing code entirely, just make it an additional skill for hams to acquire if they want it.

Thanks for reading this through. Hope I made a useful point.

Regards

Donn Hilton / VE7XDH
Victoria BC Canada

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

9-30-98

980810

98-143

F RECEIVED
1919 M St, NW
Suite 1831 AM 190
Wash. - DC
OFFICE OF TV

Re: Amateur rules

Dear Commish:

What ever happened to the credit given holders of commercial licenses, toward an Amateur exam? I got it, in 1945!

In 1952, a new exam & license was added. It took 17 yrs to get special consideration for CE holders, which amounted to "robbing Peter to pay Paul!"

I suggest -- class A as it was originally

- " B " " " "
- " C 5wpm general class
- " D cb no code
- " E phase out exam & those holding it given life tenure

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Amateurs holding a license 20 yrs or longer should have life tenure in the class held if applied for. Upgrading would require ten more yrs before tenure in the higher class.

Bands -- stop swiping amateur frequencies, such as 2.05 mc, 14.35 to 14.4 mc, 29.7 to 30 mc. Once there was 5 mtrs, but, FCC gave it to TV for chan 2. yrs later it was decided that was a mistake.

@RM -- What happened to TVI prof equipment tests? I've been inactive for some time because of a radiating TV crvr.
Language -- English! Those using bad words should be disciplined.

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FCC MAIL ROOM

Magalie Roman Salas, Office of the Secretary
Federal Communications Commission
1919 M St., N.W. Room 222
Washington, DC 20554

Dear Sirs,

In the matter of WT Docket 98-143: I am opposed to any changes that would limit the 5 wpm CW based Novice and Tech Plus licenses; and most definitely opposed to reducing the 13 wpm requirement for the General class license, and entry level HF band privileges. I am not opposed to simplifying the license structure of the Amateur Service as such. I can understand the Commission's position on that basic issue with the overwhelming work load you face. But **PLEASE** -- don't make the requirements easier! Amateur radio will not benefit from it.

Greater numbers may mean greater political clout, but it does *not* mean a better system. Just as the lowering of standards in our schools and colleges has lowered test scores, and damaged our abilities to function in society, the effect will be the same with ham radio, or any other discipline. It just doesn't work. If we continue on this path, some day the critics who say we are not worth the spectrum we hold...will be right! It will become a self-fulfilling prophecy.

No one is asking anyone to be an accomplished CW operator at the 13 wpm level, and 5 wpm is pre-kindergarten. I began listening to the ham bands in the 1950's, and for a youngster, that was a good example of what radio should be. Contrast that to the agony I feel today when I listen to the deterioration of forty years.

With ham radio, as with our school rooms: we don't need a bigger class of hams, we need 'classier' hams! We live in an exciting age, and ham radio can, as in the past, be a part of the cutting edge that moves us into the new millennium. Let's not jeopardize that.

Very Sincerely,


Joseph Fay Jr.
W000

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Federal Communications Commission
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Very Sincerely,


Joseph Fay Jr.
W000

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Arthur J. Kyle, KC4YME
7428 Brad Street
Falls Church, VA
22042

November 20, 1998

Mr. M. J. DePont
Federal Communications Commission
Public Safety & Private Wireless Div.
Wireless Telecommunications Bureau
Room 8332, 2025 M Street, N. W.
Washington, D. C., 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Mr. DePont:

Enclosed please find a computer diskette containing a copy of my comments concerning the FCC's Notice of Proposed Rule Making, WT Docket 98-143, in the matter of an Amendment of Part 97 of the Commission's Amateur Service Rules. The diskette was made using an IBM compatible and Word Perfect V. 5.1. A typed copy of my comments is enclosed for your office.

The typed original and six copies of my comments have been sent to Ms. Magalie Roman Salas, the Commission's Secretary. I have also sent a copy of this diskette to the Commission's copy contractor.

I wish to thank the Commission for raising the issues contained in the Notice and for the opportunity to comment on them. I believe the outcome of the Commission's deliberations on the Morse Code issue in particular will largely determine the future of amateur radio.

Sincerely,


ARTHUR J. KYLE

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July 22, 1998, and I feel strongly that the time has arrived for some major changes in the Amateur Service. If the goal now is to streamline the Amateur Service, reduce the administrative burden in preparing instructional material and examinations, reduce the creation and maintenance of examination and licensing records, as well as to attract knowledgeable and interested young people, then simplification is sorely needed. I recommend that the number of license classes be trimmed from six to the following three:

a. Technician Class. An introductory level composed of the present Technician Class.

b. General Class. A journeyman or mid-level class consisting of the Novice, Technician Plus and General Classes.

c. Amateur Extra Class. A combination of the Advanced and Amateur Extra Classes.

2. These changes could be effected with little disruption by utilizing as an interim measure, the existing examination question banks or database. Amateurs currently holding Novice licenses could upgrade to the General Class by passing the Technician and General Class written examinations (Elements 3A and 3B). Those holding Technician Plus licenses could upgrade to General simply by passing the General exam (Element 3B). Similarly, Advanced Class amateurs wishing to upgrade to the Amateur Extra Class would have only to pass the Amateur Extra Class written test (Element 4B). I will discuss Morse code requirements for these classes in paragraph D, below.

3. Three license classes will certainly answer the Commission's desire that amateurs have the opportunity to progress upward as their knowledge and experience in amateur radio grows. It will reduce the present complexity of frequency assignments and power limitations. Finally, and most important it will give the large number of license holders presently in the lower classes a far greater opportunity to advance into the higher classes.

B. Disposition of the Novice Bands

As indicated above, I believe you are correct in proposing the Novice Class be replaced by the a codeless Technician Class as the entry level in amateur radio. Further I feel the ARRL is right on target in recommending that the Novice and Technician Plus Classes be merged with the General Class. If this is done, I do not believe there will be any further need for the Novice CW bands. These could be abolished.

C. Greater Volunteer Examiner (VE) Opportunities (RM-9148)

The Commission has proposed that in addition to the change recommended by the ARRL, General Class licensees be authorized to

prepare and administer Technician Class tests. I feel that the change is appropriate and recommend it be adopted.

D. Telegraphic Examination Requirements

1. The Commission requested comments on all aspects of the Morse code standards used in amateur radio examinations. To begin with, Morse code has been available for well over a hundred years. It has had a long and useful existence and still has a place in radio as an alternate means of communication. It can often be copied when other modes of transmission fail. I have no disagreement with its continued use. I do object to competency in Morse code telegraphy being the overriding criteria for advancement in amateur radio. The need for Morse code proficiency has been magnified all out of proportion to its actual use.

2. In the latter part of 1996, the ARRL commissioned an opinion survey of 1,100 members and 500 non-members. The 1,100 were said to be representative of 152,809 licensed members of the organization (152,809 is roughly only 26% of all licensed amateurs). The reported rate of response to the survey was 77%. One of the results of the survey was that only 27% said they regularly use Morse code. Compare that with 72% who said they rarely or never used Morse Code (37% rarely, 35% never)(Source: QST, February 1997, p. 56, Fig. 4).

3. The ARRL has formally proposed that the Morse code requirement for a General Class license be reduced from 13 to 5 words per minute (WPM), and for an Amateur Extra Class license from 20 to 12 WPM. This is long overdue, but is to be applauded. It was unthinkable prior to the FCC's hints at restructuring the Amateur Service. I predict the reduction of the General Class Morse code requirement to 5 WPM will encourage many Novices and Technicians to upgrade to General Class, and there will be a renewed interest in amateur radio. However, I regret to say progress will likely stop there. With a proposed 12 WPM Morse code requirement to qualify for an Amateur Extra Class license, I believe we will soon be back to the same situation that now exists. If large numbers of amateurs could not advance to the General Class because of the current 13 WPM requirement, then reducing the Morse Code requirement to 12 WPM for the Amateur Extra Class license accomplishes very little. Instead of many technicians who are presently unable to advance, there will be many in the General Class who will be stymied by the proposed 12 WPM code requirement if that is adopted. There will be no incentive for an amateur to study and work to upgrade to the Amateur Extra Class unless one is a fairly competent telegrapher at speeds greater than 12 WPM. This problem is compounded by suggestions within the ARRL to increase the difficulty of Morse Code examinations.

4. If your proposed changes in the Amateur Service cover nothing else, I recommend that you adopt a requirement for one

level of Morse code, i.e., 5 WPM for both the General and Amateur Extra Classes. Further, I recommend that there be a "sunset" clause to the effect that Morse code proficiency as a requirement for amateur licensing will cease at such time as Article S25 of the International Telecommunications Union regulations is rescinded. Such a clause is needed or the FCC will be faced with revisiting this issue in the future. Please note that although the ARRL has consistently cited Article S25 as the reason for Morse code testing, the ARRL has adopted as a matter of League policy, opposition to changing the existing treaty requirement at the next World Radiocommunication Conference. (Source: QST, March 1997, pp. 58-60, 63; Item No. 49 of the agenda at the January 17-18, 1997 meeting of the Board of Directors)

5. I am not advocating elimination of CW as a method of communication. I would like to see the ARRL, other amateur organizations and amateur publications continue to encourage amateurs to learn and use Morse code. There is no reason why the many amateurs who have the talent for Morse code and enjoy the use of it should not continue.

E. Proposed Requirements for Disabled Applicants (RM-9196)

1. Is there a large or growing problem involving the process of granting Morse code waivers to handicapped persons? I have not heard or read of a single fraudulent case. Nor have I seen any statistics showing how many waivers have been granted, or even questioned. Whatever the situation is, it appears to be yet another indication that Morse code is, by itself, a barrier to advancement as an amateur.

2. FCC Form 610 contains a warning notice and a "penalty clause" in the Physician's Certificate of Disability. I believe that is more than adequate in these circumstances. I think a disabled person would be justified in claiming discrimination if more restrictive procedures are adopted. Even if the Commission permitted volunteer examiners (VE) to request medical information concerning a handicapped person, how could a VE use it? Could a VE claim greater medical knowledge and refuse to grant an exemption or require a disabled applicant to attempt an examination before accepting a physician's certification?

3. The whole proposed approach to this matter contains possible legal complications and adverse publicity for the amateur community. The FCC is correct in its conclusion that RM-9196 is unwise. The Commission is also correct in its conclusion that the clearest and most complete solution is to lower the Morse code requirement to five words per minute for all license classes and to eliminate it entirely when the international agreement is modified.

F. Written Examinations

1. I studied and successfully completed the Novice and Technician written examinations, and prepared for the General exam. I found nothing objectionable about the process. I think the VEs are to be commended for their efforts. On the whole I believe they have kept up with the more recent developments in electronics. Changes in components, equipment, circuitry and techniques are appearing ever more rapidly. I think the instructional material prepared by the ARRL and others, and the VEC question database is well done.

2. Assuming the Commission reduces the number of license classes, the number of written exams should also be reduced. As a temporary measure until a new database can be produced, the following could be used:

a. Technician Class: 50 questions from the current Novice and Technician Class examinations (Elements 2 and 3A).

b. General Class: 50 questions from the current General Class exam (Element 3B). No change is needed at this time.

c. Extra Class: 60 questions from the current Advanced and Extra Class exams (Elements 4A and 4B).

3. The Commission has asked whether questions should be added to the written examinations compensate for the lowering of Morse code requirements if that becomes a reality. Frankly I think that is unjustified. It has the appearance of an attempt to continue limiting the number of licensees by some means other than Morse code tests. The ability to send and receive Morse code has absolutely no relation to a person's knowledge of amateur radio and electronics. If additional questions were not found to be necessary up to now, it should not become a tradeoff for lowering Morse code requirements.

IV. SUMMARY OF RECOMMENDATIONS

Based on my discussion of the topics in Part III above, I recommend the Federal Communications Commission approve of the following changes to the Amateur Radio Service rules:

1. Reduce the number of license classes from six to three; Technician, General and Amateur Extra.
2. Phase out the Novice, Technician Plus and Advanced Classes by not issuing new licenses in those classes.
3. Abolish the Novice portions of the HF amateur radio bands.
4. Permit holders of General Class licenses to prepare and administer examinations for Technician and General Class licenses.

5. Replace the requirement that amateur radio license applicants demonstrate proficiency at three levels of Morse code speed, i.e., 5, 13, and 20 WPM, with a requirement for a single level of Morse code competency at 5 WPM for the General Class and Amateur Extra Class. Insert a "sunset" clause in this requirement to take effect if and when the underlying international regulation is rescinded.

6. There appears to be inadequate justification for any change in the procedures for processing applications from handicapped persons.

7. The existing written examinations are fully adequate for their purposes. Minor changes can be made to reflect the reduction in license classes, frequency assignments, power limitations and use of modes, etc., pending more detailed revisions during the normal review cycle.

I wish to thank the Commission for raising these very important issues concerning the Amateur Radio Service, and for this opportunity to submit my comments and recommendations.

Respectfully submitted,


ARTHUR J. KYLE, KC4YME
7428 Brad Street
Falls Church, VA 22042

November 20, 1998

October 22, 1998

Martin D. Wade
POB 16
Galliano, LA 70354

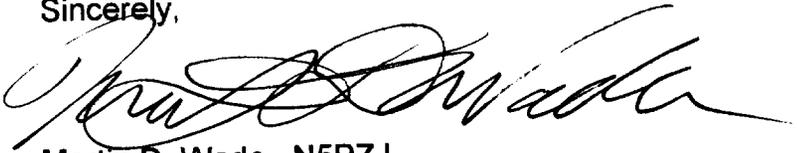
Federal Communications Commission
The Office of the Secretary
Dear Madam Secretary:

Let's comment
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Mail Room
12/2 98

Enclosed you will find (18) Eighteen Copies of my Comments on WT-Docket No.98-143 with RM-9148, RM-9150 and RM-9196 all with Original Signatures as per Commission rules

I will also submit electronic files as required, timely.

Sincerely,



Martin D. Wade, N5PZJ
POB 16
Galliano, LA 70354

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

email: mdwade@mobiletel.com

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\par In the Matter of\tab \tab \tab \tab )\tab WT
Docket No. 98-143
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\par 1998 Biennial Regulatory Review -- \tab \tab )\tab \tab
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\par Amendment of Part 97 of the Commission's\tab )\tab \tab
RM-9150
\par Amateur Service Rules. \tab \tab \tab \tab )\tab \tab RM-9196
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\par \pard\qc\plain\f2\fs22\b COMMENTS ON WT DOCKET NUMBER 98-143
\par \pard\plain\f2\fs22 \tab \tab \tab \tab BY: Martin D.
Wade, N5PZJ
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\par \pard\tx4680\plain\f2\fs22\b I. INTRODUCTION
\par \pard\tx-1440\tx-720\plain\f2\fs22
\par \tab 1. Your petitioner, MARTIN D. WADE, POB 16, 16358
WEST AVE "A", GALLIANO, LOUISIANA 70354, holding Advanced Class
License N5PZJ in the Amateur Service, serving as a Volunteer
Examiner (VE), RACES Officer for Lafourche Parish, Louisiana and as
an Official Observer in the OO Program as administered by the ARRL,
The American Radio Relay League, Inc. wishes to comment on these
matters before the Commission since as a licensee, he is directly
affected by the Commission's Actions in these matters.\tab
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\par \pard\tx4680\plain\f2\fs22\b II. SUMMARY\plain\f2\fs22
\par \pard\tx-1440\tx-720\plain\f2\fs22
\par \tab 2. In these Comments, I wish to comment on the proposal
to modify The Amateur Radio Service rules as follows:
\par
\par \pard\li1440\fi-1440\tx-1440\tx-720\tx720\plain\f2\fs22 \tab
o\tab Reduce the number of license classes from 6 to 4.
\par \pard\tx-1440\tx-720\plain\f2\fs22
\par \pard\li1440\fi-1440\tx-1440\tx-720\tx720\plain\f2\fs22 \tab
o\tab Provide greater opportunities to volunteer examiners (VEs) to
participate in the examination process.
\par \pard\tx-1440\tx-720\plain\f2\fs22 \tab
\par \pard\li1440\fi-1440\tx-1440\tx-720\tx720\plain\f2\fs22 \tab
o\tab Eliminate Radio Amateur Civil Emergency Service (RACES)
licenses because the emergency communications that routinely are
transmitted by RACES stations can be transmitted by primary, club
or military recreation stations.
\par \pard\tx-1440\tx-720\plain\f2\fs22
\par \tab 3. I wish to comment on ideas for improving the
enforcement processes as they relate to amateur radio.
\par
\par \tab 4. I also wish to comment on changes to the telegraphy
requirements for the amateur radio service and to the written
examinations that must be passed to qualify for an amateur radio
license.
\par \tab
\par \tab 5. I also wish to comment on Question Pools and their
content.

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\par \plain\f2\fs22\b III. \plain\f2\fs22\cf0\b DISCUSSION

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\par A. Number of License Classes

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\par \tab 6. Before we can propose to reduce the number of classes of Licenses in the Amateur Radio Service, we must first examine a question of the telegraphy part of the requirements as not to create a wide gulf between the "No-Code" Technician and the General, Advance and Amateur Extra Classes, which will retain a code requirement. This will illustrate the logic of change needed to bring Amateur Radio in step with technology.

\par

\par \tab 7.\tab The first question is whether to do away with the Five (5)wpm code test and have just one speed or higher speeds and this, if adopted would shatter the ranks of Amateur Radio and not serve the purposes of the establishment of Amateur Radio as found in 47 C.F.R. Section 97.1.

\par

\par \tab 8.\tab The Second Question is to determine if we retain the 13 and 20 wpm code test or adopt a 10 wpm code test in lieu of other higher speeds.

\par

\par \tab 9.\tab The Novice Class, which was the entry class into Amateur Radio before the adoption of the codeless Technician Class should be modified and/or eliminated as a class as the Third Question and the Technician Plus License as the Fourth Question.

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\par

\par \tab 10.\tab The First Question and the Second Question could set a new course and tone for the Amateur Radio Service as placed forth by the ARRL Proposal, viz., by placing less emphasis on the code as is the case in most countries and allowing the question pool to cover the currently used digital modes in an expanded mode.

The (5) Five WPM test should be kept as an element and used as the entry level code test, the adoption of the (10) Ten WPM Code test in place of the presently used (13) Thirteen WPM and (20) Twenty WPM would work to eliminate the amount of manpower needed to administer an examination, by adopting (10) Ten WPM, the amount of time needed to learn the code would not be a deterrent to learning the code, the amount of Physician Exemptions would dwindle due to the ease of learning the reduced speed and would serve to keep code as a part of Amateur Radio while not creating an

\par insurmountable barrier to obtaining an Amateur License with HF privileges.

\par

\par \tab 11. \tab The novice class should be eliminated over the next (10) Ten Years with a sunset period to allow the current Novices a chance to upgrade to a higher class of license. The present licensees should be permit to renew during the sunset period and operate with current privileges but not indefinitely since this would defeat the purpose of streamlining the Amateur Radio Service Rules.

\par
\par \tab 12.\tab The Technician Plus Class should likewise be eliminated over the next (10) Ten Years with the (5) Five WPM code credit carried indefinitely. The Technician Plus License would be made a Technician Class with code credit after the sunset period.

\par
\par \tab 13. \tab The General Class License should only be required to demonstrate a (5) Five WPM code test as well as the written element now required. This would allow the Novice Class Operator only to pass the written Technician Class Element as well as the General Element with credit to be given for the (5) Five WPM Code Test. The Technician Class Licensee which holds a permit for that class issued before 1987 would automatically become General Class, Technician Class Licensees licensed before 1992 would only be required to pass the written General Class Element with credit given for the code element.

\par
\par \tab 14. The Advanced and Amateur Extra Classes would be required to pass the (10) Ten WPM code test as well as the respective written elements which should lean toward the new technological advances in digital communication in order to keep the Amateur Radio Service on the frontier of the Radio Art as contained in Part 97, CFR 47.

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\par B. Greater Volunteer Examiner Opportunities
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\par \tab 15. Currently, an Advanced Class operator cannot prepare or administer a telegraphy examination for an examinee for a General Class license. Only an Amateur Extra Class licensee can administer that examination. The ARRL requested in RM-9148 that the Amateur Radio Service rules be amended to permit Advanced Class operators who are VEs to prepare and administer examinations for a General Class operator license. The ARRL argues that this is consistent with the Communications Act and will help fulfill the need for more volunteer examiners. I request that this policy be adopted to allow Advanced Class operators to prepare and administer examinations for the General Class operator license. As proposed by the Commission, on their own motion, to permit General Class operator licensees to prepare and administer examinations for Technician Class operator licenses, I agree. In all cases, examiners will be administering only elements which they themselves have received credit for. These proposals will benefit potential amateur service licensees by having additional volunteer examiners available for the examinations. This will increase the opportunities to obtain Amateur Licenses and is in the full intent of the Volunteer Examiner Program.

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\par \plain\f2\fs22\cf0\b C. RACES Station Licenses

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\par \plain\f2\fs22\cf0 \tab 16. The Radio Amateur Civil Emergency Service (RACES) is a radio service using amateur stations for civil defense communications during periods of local, regional or national civil emergencies. No new RACES station licenses have been granted since July 14, 1980. The Commission discontinued issuing new RACES licenses in order to conserve Commission manpower and resources. At the time of that action, there were 611 RACES licenses. Currently, there are only 249 RACES licenses.

\par

\par \tab 17. The distinct callsign issued to Civil Defense Organizations under the RACES program helps to identify Government RACES stations. Since the Commission has not issued any new licenses since July 14, 1980, the \plain\f2\fs22\cf0\i status quo\plain\f2\fs22\cf0 by not issuing any new RACES station licenses has been maintained and by eliminating the RACES licenses, the Commission would be taking a step to conserve the Commission's financial resources, but will also eliminate licensing duplication but increase confusion as to who is RACES in an emergency. It should be emphasized that the same emergency communications that are now transmitted by RACES stations can continue to be transmitted by primary, club or military recreation stations. Part 97 permit two types of stations to operate as part of RACES: (1) a licensed RACES station, and (2) any amateur station that has been properly registered with a civil defense organization. Thus, to engage in RACES communications, it is not necessary to have a RACES license with a separate and distinct call sign yet the distinct callsigns help stations stand out and be identified as a RACES station. RACES Callsigns should be treated as any other Club callsign and allowed to be placed in the Vanity Callsign System. Before any action, the Commission should further study the RACES Program and its place in Part 97.

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\par D. Privatization of Certain Enforcement Procedures

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\par \tab \plain\f2\fs22\cf0 18. The enforcement of FCC Regulations has been dismal with a few spots of enforcement on high visibility cases. The Amateur Auxiliary could be used to a greater degree by Commission Personnel by the adoption of direct points of contact between the Amateur Auxiliary and Commission on the local level. At the present, the single point of contact does not allow for rapid dissemination of information between the Amateur Auxiliary and the Commission. Here are several suggestions to improve this relationship and obtain better enforcement results:

\par

\par \tab \tab A.\tab Encourage persons in the Amateur Auxiliary bringing complaints to the Commission to include a draft order to show cause to initiate a revocation or cease and desist order as proposed by the Commission.\tab \tab

\par

\par \tab \tab B.\tab Develop a comprehensive guide to the Formal Hearings and Administrative Law Judge duties and responsibilities as to give the individual Amateur Auxiliary Member an understanding of their role and limitations, also in such a guide, place the clear and concise guidelines under which the Amateur Auxiliary functions.

\par

\par \tab \tab C.\tab Develop local contact points for problems which require immediate attention such as illegal operations by pirate operators, operations by unlicensed entities, interference between stations in different Services, i.e. Amateur-Citizen Band or Amateur-Commercial Service.

\par

\par \tab \tab D.\tab Institute a Toll-Free number to central reporting area for members of the Amateur Auxiliary whereas items not reportable to the local office (e.g. HF violations, suspicion of radios used in the commission of illegal activities. etc.) or where there is no convenient local officer and/or office.) The main purpose of this duty officer concept would be to have a central log of problem areas and documentation of serious violations. \tab

\par \tab \tab \tab

\par \tab \tab E.\tab Use verifiable information taken by Volunteers which leaves no doubt as to the authenticity to the information without having the enforcement division to independently corroborate any volunteer-gathered evidence. The present policy of having the enforcement division collaborate any outside evidence gathered slows the process of enforcement given the resource limitations of the Commission's Compliance and Information Bureau. By having the volunteers place themselves under oath and allowing the legal proceeding to continue only after determination of probable cause exists then hearings should be held on the subject matter.

\par

\par \tab F.\tab The recent institution of an Amateur Enforcement phone line is a step towards the establishment of the concept expressed herein without the live duty officer to determine if the violation warrants further investigation. This enforcement action line could be shared between many different radio services and this would help implement the problem resolution agreements that are found in other services as well.

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\par \tab \tab G. \tab By the use of advanced equipment such as Automatic recorders, Doppler Systems with Computerized Triangulation, and remote monitoring sites which could be deployed and then checked on by Commission Personnel as well as the Amateur Auxiliary, a rapid deployment of equipment of this nature would allow the Commission to check on hot spots as well as gather evidence by remote means. The concept has merit and it is in the Public Interest, necessity and Convenience to carry out the mandate under the Communication Act of 1934 as Amended. \tab \tab

\par
\par \tab \tab H. \tab In closing on the Amateur Auxiliary, a closer relationship between the Commission Compliance and Enforcement Group, Field Agents and the Amateur Auxiliary Member should be sought in order to create a local response team which can better gauge the problems encountered, determine the best course of action and to be sure that due process is afforded all persons.

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\par \tab 19. \tab Your Petitioner, is an Official Observer under the ARRL in the Amateur Auxiliary and the biggest problem encountered by my experience is the proliferation of illegal operators operating in Amateur Radio notably, the Two Meter Band, and Ten Meter Band. The other big problem is malicious interference and nipping it in the bud, we avoid problems that carry themselves into other radio services and have the potential to be a threat to safety and life issues. The general perception on the street is that the Commission has either lost interest or does not care, this in turn fuels the notion that illegal use of spectrum or violations of the Commission Rules and Regulations will not be prosecuted, so it becomes a vicious circle which could be broken by simple application of the enforcement stick.. There is a great deal of self-compliance in the Amateur Community yet The Amateur Auxiliary does have a part to play and the Volunteers need to have direct access to the Commission at all times in order to bring serious violations to heed in a timely manner. By using the Amateur Auxiliary to be the extended presence of the Commission, the presence of the Commission will help to keep order in the radio spectrum as a whole.

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\par E. Telegraphy Examination Requirements

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\par \tab 20. True, in the early days of amateur radio, radiotelegraphy was the primary communication mode of all radio operators, including amateurs. Testing for knowledge of Morse code telegraphy was necessary to ensure that amateurs could recognize and stay away from Government and commercial stations as well as stay clear of maritime distress messages. Today, radiotelegraphy is just one facet of many diverse modes of radio communication that require a technologically literate licensee.

In 1990, in response to the sentiment of the amateur community,

the Commission established a codeless Technician Class operator license. In so doing, the amateur service should attract technically inclined persons. At that time it was also stated that the Commission believed that telegraphers would be in less demand than electronics and communications experts. Therefore, codeless Technician License provided an entry level opportunity to otherwise qualified persons who found that telegraphy was a barrier to pursuing the purposes of the amateur service. Those purposes include encouragement and improvement of the amateur service by providing opportunities for advancing both communication and technical skills, and the expansion of the existing reservoir within the amateur radio service of trained operators, technicians and electronics experts.

\par

\par \tab 21. The decreasing role of telegraphy as a communications mode also is demonstrated in the implementation of the Global Maritime Distress and Safety System (GMDSS). In permitting GMDSS to replace the mandatory Morse code equipment and operator, the Maritime industry made the movement to newer and better technology for distress situations. The GMDSS relies on satellite and automated terrestrial communications systems for distress and safety communications. The Commission noted that by incorporating these advanced communications techniques into the safety system, GMDSS would significantly improve safety of life and property at sea throughout the world.

\par

\par \tab 22. The international \plain\f2\fs22\cf0\i Radio Regulations\plain\f2\fs22\cf0 (\plain\f2\fs22\cf0\i Radio Regulations) \plain\f2\fs22\cf0 that apply to the Amateur Radio Service require that all amateurs licensed to operate below 30 MHz demonstrate their ability "to send correctly by hand and to receive correctly by ear, texts in Morse code signals." The \plain\f2\fs22\cf0\i Radio Regulations\plain\f2\fs22\cf0 do not specify any particular speed.

\par

\par \tab 23. In view of changes in the technologies that amateurs use to communicate generally, and views with regard to the Morse code requirement specifically, the three levels of 5, 13, and 20 wpm are not relevant to today's communications practices. The code is not used by the Maritime Industry nor by Commercial Communication Circuits, replaced by faster digital modes with greater accuracy. We continue to have three different levels even though two levels would be more than fulfill the requirements, (5) Five WPM and (10) Ten WPM. We should we add elements to the written examination to ensure a working knowledge of the newer digital technologies which, in part, are replacing the Morse code. The best and fairest method of examining for Morse code proficiency is copying one out of five minutes sent, instead of allowing VEs to determine how to test for code speed, this will eliminate guessing and give a clear understanding of the applicants knowledge of Morse Code.

\par

\par \tab 24. Additionally, in RM-9196, the ARRL requested

amendment of the amateur rules which allow telegraphy examination credit for the higher telegraphy speeds to examinees with a disability. Specifically, the ARRL requests that the examinee be required to attempt the higher-speed telegraphy examination before examination credit is given pursuant to a doctor's certification. In addition, the ARRL requests that volunteer-examiner coordinators (VECs) be authorized to request medical information from the certifying physician pertaining to the examinee's disability. It should be noted that these issues only remain relevant if we retain the higher telegraphy speeds requirement, since if the requirement were eliminated, a person with a disability would not have to apply for examination credit. Ten WPM (10) should allow some leeway and if a medical condition exists, then it should be handled as it is presently. The Privacy concerns about a person's medical condition is one that should remain between his or her attending physician and the examinee. To allow non-medically qualified persons to make medical judgments and subject the examinee to ridicule or derision due to a medical or physical condition is a position which can not be allowed nor tolerated by the Commission nor any of its volunteers. I respectfully ask that this item be rejected in the public interest.

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\par F. Written Examinations\plain\f2\fs22\cf0

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\par \tab 25. As the system presently exists, it should be left. The VECs set up the question pool on a volunteer basis without cost to the Commission but to allow the individual VECs or VEs alter the questions in any form could lead to the creation of extremely easy or extremely difficult examinations. We must strive to keep the examination questions fair and workable for every applicant as to prevent any compromise on the standards of the examination. I respectfully ask the Commission to keep the examination as to question pools kept in the open domain in the public interest.

\par

\par \tab 26. The VECs, however, should be allowed some latitude in deciding which group and topics to cover and in which proportion due to the changing technologies and regulations. This should be as to effectively test the applicants current knowledge of the subject matter in use. The leeway requested should be codified in Part 97 by allowing the VECs themselves to decide which topics to cover in future examinations.

\par

\par \tab 27. By allowing VEs to change or modify tests could lead to very hard or very easy exams given to the dismay of the Amateur Radio Service. As a VE, by having a guideline set down by the VEC would eliminate this temptation and ensure the interest of the General Public is being met by having a standard type exam with the context of the exam outlined by Federal Regulation by the VEC

System. It is not in the Public Interest to have different types of exams unless the purpose would be to accommodate a person who is disabled or otherwise handicapped.

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\par \plain\f2\fs22\cf0\b CONCLUSION\tab

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\par \tab \plain\f2\fs22\cf0 28. Your Petitioner, Martin D. Wade, respectfully submits these comments before the Federal Communications Commission, Washington, DC. on this 22nd

\par Day of October, 1998.

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Martin D. Wade

\par Amateur License N5PZJ\tab

\par POB 16

\par GALLIANO, LA 70354\tab

\par email: mdwade@mobiletel.com \plain\f2\fs22\cf0\b \tab

\par }

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

In the matter of _____

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

1998 Biennial Review
--Amendment of Part 97
of the Commission's
Amateur Service Rules

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~~11-30-98~~

To: Federal Communications Commission

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DEC 11 1998

COMMENTS OF:

I. INTRODUCTION

I, Gerald T. White, 8455 Pine Hills Dr., Oakland, CA 94618
1532 file these comments on 9 November 1998 in the FCC's Notice of Proposed Rule Making, WT Docket No.98-143.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY 11-

I was first licensed in 1937, 61 years ago and now hold an advanced amateur license; a graduate of Leland Stanford Jr. University 1942 with an AB in Electrical Engineering. I served 29 years in the U.S. Navy, and accelerated courses in RADAR at MIT, Aero Engineering at CALTECH, and retired as a commander in aviation electronics engineering. In my travels I have held 5 amateur licenses and met, worked, and trained many amateur radio operators; I also held a radio telephone 1st. class commercial license prior to WW II.

In summary, I whole heartily agree with the comments and attitude of W5YI as stated in the October 1998 issue of CQ magazine on pages 94-96.

1. Six classes of licenses are ridiculous- three are enough: Technician, General, and Extra.
2. Abolish Novice licensing, it has served its purpose long ago. Applicants overwhelmingly prefer a no code TECH path into amateur radio.
3. Delete frequency limitations on Novices and power limit limitations on other classes using the former Novice frequencies. Novices: 200 watts max. on 80,40,15, & 10 meter bands.
4. Techs before March 21, 1987 become General class, others pass element 3(B) and pass a 5 WPM code test. General class should also become 5 WPM.
5. Advanced Class should be permitted to be VE's for General Class.

[Handwritten signature]

GERALD T. WHITE, WB6IZE comments

on WT Docket 98-143

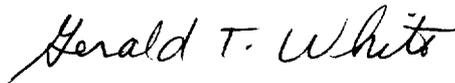
6. Eliminate RACES licenses. This will eliminate a long standing feud between two important groups.

7. Continue Amateur Auxiliary .

8. Code speed 5 WPM for General class, Advanced, and Extra class licenses. It is time to STOP the use of useless code speed requirements to reserve use of the ham bands by a few senile old operators many of whom can no longer pass the code themselves. This has greatly reduced the overall use of the amateur bands that we need so desperately for training, experimentation, and emergencies.

9. YES! YES! 5 wpm for all where required by international regs. Long over due. Let's get it done before we loose ALL our amateur bands.

SINCERELY YOURS;

A handwritten signature in cursive script that reads "Gerald T. White".

GERALD T. WHITE

MJDePoint Public Safety and Private Wireless Division
Wireless Telecommunications Bureau
Room 8332
2025 M Street, N. W.
Washington, D.C. 20554

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DEC 11 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: WT Docket No. 98-143

The following are my comments relative to the Notice of Proposed Rule making for Amateur Radio.

My name is Gary S. Dewey, amateur radio call NI8Z. I have been involved in radio communications since my teenage years. First as a radio operator in the US Navy, then as an OCR for the CIA, now just pursuing the "hobby" of amateur radio. I am a member of ARRL, a VE for the ARRL, a member of FISTS #5037. I am the vice president of the Cuyahoga Amateur Radio Society. I also am a retired electrical engineer. My comments will be based upon my experiences with most aspects of amateur radio obviously which includes the Volunteer Examinations.

I turned to amateur radio after experiencing what I would classify as professional communications activity. The US government has invested a lot of money in my training. It also helped me to obtain a BSEE from the University of Toledo. It was because of my interest in communications that I went back to college after ten years working for the government.

My main interest in amateur radio is the thrill of talking to someone who has experienced the planning of putting radio equipment together, building a radio station, then has the competence to use that equipment within the rules and guidelines that have been established. I especially like the "international" aspect of the hobby. It is an exhilarating experience to communicate with foreign amateurs. This is usually accomplished using the "international" Morse Code. Isn't that an interesting name? International Morse Code. Almost like the concept of Esperanto. A language everyone can use to communicate to each other. There is no continent, no country that can be contacted where this means of communication is impossible.

With the foregoing as background, let me address the issues in the NOPR.

No. of Copies rec'd 0
List ABCDE

First, under IV, Discussion, A,
Number of License Classes,

The number of license classes are too many. It should be more like 3 or 4. The Novice license is for all consideration useless. I have given two years of VE exams and no one has come to an examination for the sole purpose of obtaining a Novice license.

There should for anyone who cannot or will not learn the international Morse Code an amateur radio license classification.

My reaction to anyone wanting to be an amateur radio operator but just wants to operate without all of the various means available is to let them "get a taste". These amateurs will buy equipment, join clubs, participate in local radio events, even help in times of emergency. This in my opinion is not even the entry level to amateur radio. Its like amateur kindergarten. Most of these amateurs don't understand the phonetic alphabet.

Some go on to explore further, many will just stay with the few privileges they have.

If it helps some think the numbers of amateur radio operators are growing then so be it.

The important thing to remember is that even though this group many be large and vocal, it would be like the kindergarteners telling the high school students what the curriculum should be if dumbing down the skill level for other classes is there goal.

This license is about an half step above CB. Many amateurs become NO Code technicians not as an entry to amateur radio but to become radio mobile operators. They use local repeaters to chat, pass the time of day but not discuss the many aspects of improving their skills or amateur radio. In fact, many of them "bad mouth" amateur radio. Keep this group in the UHF/VHF portion of the amateur spectrum.

The entry level to amateur radio would be where the amateur that understands all modes of communication. As was stated in your background this includes "voice, teleprinting, telegraphy, digital packets, facsimile and television". Not only understands these modes but has some competence in how to use them. Naturally, this calls for understanding and displayed some skill in using the "international" Morse Code. Call this group Amateur 3rd class or General Class or C class, the name is not important. My recommendation is give them access to 1/3 of the HF amateur radio spectrum.

Then have the other classes Amateur 2nd class or Advanced or B class, again the name is not important but the frequency allocations are. Give them 2/3 of the HF amateur radio spectrum. Last, the highest class Amateur 1st class or Extra or A class. Give them access to 100 per cent of the HF amateur radio spectrum.

That is my recommendation for the license classes.

B. Greater Volunteer Examiner Opportunities.

The idea that an Advanced licensee can administer the General Code test is a lesson in common sense, since the Advanced had to pass the General Code speed to become an Advanced licensee in the first place. I don't see this in helping get more VEs however.

The real issue is getting enough VEs to be able to administer all the tests. If anything, the three VE rule is at issue. Also, the issue of not allowing those VEs with an Extra license to administer all the tests is troublesome. Especially if one of them has obtained the Extra license by the physically handicapped examination policy. Nowhere on the license or on the VE badge is that stated. How does a local VE coordinator determine that or verify that? This problem can be solved easily. Just revoke all handicap waiver for the Extra license.

See my comments regarding RM-9196.

I believe the VE program has worked to provide more testing opportunity. It has saved taxpayers lots of money. I feel my recommendation will get more amateurs to the Extra class license category. This will then most likely get more VEs who can administer all the tests.

My recommendation supports the idea of when a VE has a license higher than the one being tested for a VE can administer it. But I wonder how many FCC officials had an Extra class licensee when the FCC was giving the tests? And, I don't remember three being present.

C. Races Station Licenses

No Comment.

D. Privatization of Certain Enforcement Procedures

I am in favor of ridding the amateur radio bands on intentional malicious interference. The trouble is you may get the ARP, the Amateur Radio Police. Being an avid Dxer, I hear this intentional interference too many times. I also hear the DXP, the DX Police. They sometimes are as offensive as the malicious interference. But alas, that does nothing to solve the problem. As with any enforcement, it needs to be swift and sure. Any action by the FCC to announce a workable mechanism to ensure swift and sure

enforcement can only be seen as a positive condition.

I feel the FCC has done little in the way of letting the amateur radio community understand what the Amateur Auxiliary is or does. Personally, I know nothing of what this Auxiliary does. How is one recruited? Can amateurs volunteer? What kind of training, equipment do they have or get? How are they contacted? Where are they listed? What procedures do they follow: What avenues of communication are open to contact them? In all the material I receive, from amateur radio magazines, bulletins, e mail, other than a few articles of some ham has been caught, this Amateur Auxiliary is a mystery.

Most amateurs can detect interference but not locate it. Is there an "interference HotLine"?

I have to agree with the ARRL. This Amateur Auxiliary should be used to greater advantage. If it is in place, active, and working for the amateur radio community then shine some light on it. Tell us or show us how a formal complaint is submitted to the FCC in a manner that would allow for the swift and sure enforcement. In general, the amateur radio community is considerate and desires to keep interference to its absolute minimum. The FCC has left a bit of a vacuum on this enforcement issue.

E. telegraph Examination Requirements

My comments are based on the fact that before I could use a radio for the US Navy they sent me to Radio School to learn the code. Also it was based on these skills that I was hired again by the US government to work for them in Foreign Service. I am thankful for this training but then the government got its monies worth. Now the FCC is considering comments on telegraphy and this mode of communication. The FCC should keep in mind all modes of communication are useful. All communication is based on language. The Morse Code is a language. One can not use it unless they learn it and practice using it. Being able to speak this language has giving me moments of exasperation as well and exhilaration. But what language wouldn't. And again, to think that its an international language. It was not easy learning the code, and especially to learn to use it at 22+ wpm to graduate from the radio school. I have taught the code to many

individuals. I see many trying to take the CW test. I know the work and time they have given to learning this new language. Passing the code test is a victory. A victory for the individual who wants to participate in a new activity. All of this talk about telegraphy having a decreasing role as a communications mode is MUTE. It is about as useful as saying English has a decreasing role in the use of a computer. I will be the first to say telegraphy is not for everyone. Many flunk out of radio school. They went on to do something else. Anyone not wanting to or unable to learn the international Morse Code can learn to do something else other than amateur radio.

The first mistake was the idea that it was the amateur community who wanted to create the Codeless amateur. It was organizations and manufacturers that wanted to increase the number in the amateur community for monetary reasons. The idea that this would attract more amateurs who would be technically inclined missed the point that a lot of technically-inclined don't talk to each other. Amateur radio operators are used to talking to someone. How do you do that? By tapping on a key and producing characters or pushing a switch and using a microphone to talk. Talking to someone is a mixed blessing. One must use the same spoken language as the receiver but there are other factors, such as dialect, tone, loudness, clarity of words, correct pronunciation, identical meaning of the word. International Morse Code has little of that. It is just translating a character to a letter, sorting the letters out to identifiable words, the words can be any language. The whole idea is two people are "talking" to each other when they normally could not understand each other.

The concept of telegraphers being in less demand is undoubtedly true. They are going the way of the dinosaur, the horse and buggy, and iron horse. The decreasing role in military telegraphy communications, Maritime communications gives one the idea that telegraphy is a dying concept. No one wants to sit a hour copying CW broadcasts anymore when the message can be sent in a flash of the eyewink via satellite. Everyone wants faster communications. Look at the computer industry. Every month another new xxxMhz computer chip in on a new motherboard. Cellular telephones will be worldwide soon. Digital communications is everywhere. FAXs, point to point modem connections all are much faster than CW. Besides with digital communications you get graphics, pictures (in color). But the International Radio Regulations still apply to the Amateur Radio Service. International Morse Code is a requirement below 30 MHz. We are past the Code - No Code

issue. The FCC created the Codeless Technician. It will keep the Codeless Technician in some capacity of Amateur Radio Service.

So being past the issue of "Code or No Code". Then the issue comes down to not do we keep the "international Morse Code" but at what competency level do you have to test. Years of government testing should have provided for ample documentation as to the difficulty of learning various levels of CW code speed. I understand not everyone can learn CW at 5 wpm. However, 5 words per minute constitute 25 characters per minute. This has been a minimum requirement from the beginning.

Since there is an effort to downsize the number of license classes, then let the 5 wpm entry level code be for the General, Amateur 3rd class or C class entry previously recommended.

The speed levels for the next two classes get to be very arbitrary. The reason for this is from my experience, there are physiological barriers to learning CW. While I was learning the code for the government, from the government, the code mental transfer from hearing to putting it down on hardcopy shifts around 12 wpm. Most, once they learn the letters and numbers can copy from 5 wpm up to 10 wpm without problems. At 12 wpm, the code recognition must be "automatic", its now a matter of keeping up. After that 12 - 14 wpm

barrier is passed then most everyone can get to 20 wpm with practice. Although, there is another plateau at 18 wpm. I have been told by individuals who can copy CW that sometimes the characters "just run together" without any separation after 18 wpm. I am sure that due to individual hearing acuity this is a problem. For me, after 50 wpm I think it all runs together without separation. Its just a fact.

Now getting back to the speed levels after 5 wpm that I would think again should be based on government testing in the past. But my recommendation would be to have a different level for each amateur license class for HF band privilege. Its consistent, its fair. My suggestion based on what I feel is the general trend to make things as easy as possible is to keep three test speeds. Make them 5 wpm, 10 wpm and 15 wpm. What is the basis for this.

Five wpm has been and should be the entry level speed for any amateur to the HF bands.

This would allow all existing Novices and No Code techs to change to the new General, amateur 3rd class or C class license. By making the next speed 10 wpm for Advanced, amateur 2nd class or B class license you make it a step up for the existing General class.

It would only be a very minor retesting for 15 wpm, only 2 wpm faster for anyone who has passed General and Advanced license to become Extra, amateur

1st class or A class.

One concern I have is some of the amateurs who take the Extra 20 wpm CW test have mentioned to me that they take this test for credit for the FCC Commercial license credit. They say they get credit for the CW endorsement and save money doing it.

By moving the Amateur Radio Service Extra Class CW test to 15 wpm may stop

that activity. But I assume the FCC will be dropping the CW requirement for the commercial licenses soon anyway.

I think though to make it a major shakeup the FCC would have to include with the license structure, a frequency spectrum structure change. Maybe to the 1/3, 2/3, 100 per cent model. What would the existing Extra class get with this change, maybe not much but

they have all the allocation they need anyway. Maybe make the digital band plan wider.

There will always be those that say why keep CW at three speeds for testing. My reply

to that is if they want to be involved with the International community you have to

have the skill to use the spectrum skillfully. Amateur radio is not just for stateside

persons. That is what makes it the jewel it was set up to be. Lets keep the eye on the prize.

There is much international goodwill going on in the world due to amateur radio.

As to the comments regarding RM-9196, the ARRL amendment allowing telegraphy examination credit for higher speeds due to disability. My comment is that this

disability waiver is a farce. It has been abused. It serves no real purpose other than to let

some amateurs have extra voice spectrum. The Extra class license is held by some

who have not passed a CW test and then if they become VEs they cannot administer the

tests. I feel I cannot express my complete lack of understanding why this waiver has not been

abolished. The FCC has set license requirements then allows a waiver? Make it simple,

if you cannot pass the license requirements, then one is not entitled to it, period. If you

can't pass the bar exam you cannot become a lawyer. If you cannot pass a medical

examination, you cannot become a doctor. Do you want doctors to become less skilled?

What if a doctor has a handicap and is not skilled to operate, do you want a waiver created?

As a VE, I have had amateurs that I know use the waiver method to become Extra. I have

had VEs with Extra class licenses with the waiver exemption as VEs. Unfortunately, none of them had any intention of using the CW spectrum. They basically wanted the prestige of the higher class license. Oh, they had handicaps. Sugar diabetes, kidney operations, both did not handicap them enough to be unable to take the test. In our society, we have great compassion for those handicapped. And well we should. There, but for the grace of God, go we. But as much as I am in favor of the trying the CW test under any circumstance, no one should get a license based on a handicap waiver. It is unfair to the handicapped who overcame the handicap to succeed. It is unfair to those that have succeeded without handicap and see those with bogus handicaps be given the same privilege. Have you ever seen the no armed man play the guitar? It has been done and very well too.

E Written Examinations

My suggestion is to make the written portion representative of the real operating world.

Increase the number of questions for each written test for all elements.

The number of questions are too few. Each written test segment should have a minimum

of fifty questions. The new percentile for correct answers would be the same for each written segment, 80 per cent, 10 wrong maximum. This is reasonable from the number of written tests I have seen. If they get more than 20 per cent wrong they more than not have greater that thirty per cent wrong. One of the considerations of lowering the CW requirement was to make the written

portion tougher. This is my suggestion on a way of doing it.

Again, what is the goal. The idea

is to gain new members into Amateur Radio Service with a level of competency to begin

to operate in the frequency spectrum that is allocated to them.

Would fifty questions to check by a VE impose any difficulty. It takes about a minute to check answers. Do the VEs have any idea of the real skill level of the examined. No, that is left up to the designers of the questions. Therefore, increasing the number of questions has little if any real time impact on VEs. The concept of allowing VEs flexibility to determine specific contents of

written examinations and the specifics of that flexibility is interesting but troublesome. As a ARRL VE , I have been very satisfied with the written testing material provided. I have not been privy to input to the multiple-choice question pool. But then I don't feel I need to be.

My volunteer activity to provide the site, timing, VE group, administer the tests and record the results is more than enough. To "play" with the questions or have some sort of flexibility in selection of questions, in my opinion, puts more onus on the VE. I feel the question selection on each test should reflect what the candidate should know based on "understanding" of the activities in the Amateur Radio Service, not memorization of answers found in books or manuals. I would like to see more "what would you do when such and such a situation occurs". But then again I would like to see all amateurs retested periodically. That tells you how I feel about using it or losing it.

My experience in conducting VE sessions has been this. I have no idea what question is being asked. Nor do any of my volunteer examiner assisting me. Only the candidate sees the test. The answer sheet is graded by three VEs using a template. They just mark right answers and wrong answers. The grade is determined and the rest is paperwork. The tests get packed up and resent to the ARRL. I may be one of the few that do it this way but I am not in anyway involved in the questions being asked. Should I be? I think not. The FCC in my opinion is responsible for the question pool. It now seems that it has been farmed out the National Conference of VECs. Two of the VECs, I am familiar with the ARRL and W5YI. These two have divergent views of the Amateur Radio Service. Both have financial interests in the VE process as well as Amateur Radio. However, ultimately the quality of the Amateur Radio Service is up to the FCC. Do we want more Amateur Radio Service People or better Amateur Radio Service people?

Respectfully submitted,

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