

The comments brought before the Commission in this rule making represent the opinions of the amateur radio community as a whole. The opinions, and the reasoning behind them, are as varied as the individuals that wrote each of the comments. However, there is one underlying principle guiding all of them: the continued viability of amateur radio.

In preparing my reply comments in the matter of WTB docket 98-143, I again urge the Commission to act quickly in this matter, and to render a well thought out system that will serve the needs of the public for years to come.

Petitioners in this RM presented several interesting new ideas. I feel compelled to comment on a few of them.

#### CQ's "Activity" Based System

Magazine publisher CQ Communications suggests that the current amateur written and Morse code test system be supplemented by requiring amateurs pass certain activity-based requirements before being eligible to upgrade to the next highest class of license. While I certainly agree that CQ has correctly identified a problem, I cannot support this proposal.

As a Volunteer Examiner, I see many problems with verifying that that these activity steps are completed. What type of proof must an applicant produce, for instance, in order to verify that he or she has participated in an amateur radio public service event? Who will be responsible for verifying these items? The bottom line seems to be a more difficult system for the VE's to administer, with even more room for abuse than the current code waiver system has produced.

Certainly, CQ is correct in stating that amateurs should be required to show proper operating practices in order to upgrade, but there is absolutely no reason to believe that this cannot be accomplished through the written examinations. Further expansion of the question pools can easily allow the written exams is obviously needed, and should be mandated by the Commission through the RM.

#### Education and Amateur Radio

As I previously stated in my original comments on this matter, the ARS' days as an experimenter's radio service are quickly coming to an end. The technical state of the art has developed to the point where few amateurs are able to use their privileges to develop new communications technology in a meaningful way. Most new communications technology is developed by large companies with billions of dollars of Research and Development resources and capability far beyond that of the amateur home-brewer.

Further, amateur radio's days of providing emergency communications are likewise coming to an end. The proliferation of communications technology allows most individuals and agencies to handle their own emergency communications needs using cellular, PCS, or two-way

services. On the horizon, satellite-based systems will allow emergency communications to get through even though locally based repeater systems might not be operational.

Rather than lapsing into a service of "hobbyists," the direction that the ARS is currently heading, I believe that the FCC should set new goals for the service. The first, and most obvious of these goals, should be the furthering of education in regards to electronics, wireless communications, and computers. Amateur radio operators are the natural ambassadors of these arts, and the use of amateur radio can be a great asset teaching these fields in the classroom.

For this reason, I urge the commission to ammend the purposes of the amateur radio service to include "The furthering of electronics and communications based education." This will help provide the service with a goal and a direction that can extend well into the 21st century.

To this end, I also strongly support CQ's notion of a permit which would allow a school teacher or educator to maintain an amateur station which could be operated without the need of a licensed amateur being present to monitor the communications. I believe that the proposal offered by CQ in this matter is sound and enforceable, and I urge the Commission to move forward with creating an "educator's permit" to satisfy this need.

#### A New Licensing Structure is Mandated by This Rule Making

The arguments presented in this rule-making confirm the need for an overhauled licensing structure. Based on the arguments presented, the new system should be comprised of three classes of license roughly equivelant to today's Technican, General, and Extra class. No compelling arguments were made which justify the need for any more than three tiers.

The requirements for each class should include a 100 question written exam with multiple choice questions. Each test should be drawn from a pool of no less than 2,000 questions (20 questions in the pool for each question on the test) to make simple memorization of the questions and answers more difficult.

The "Basic" class question pool should be created by combining the pools of the current Novice and Technican classes into one pool (deleting or revising questions where needed). The "General" class pool should be roughly equivelant to that of the current General class, and the "Extra" pool should be created by combining the current Advanced and Extra classes. Additional material for all of the question pools should be on the subject of operating practices and proficiency appropriate to the class, and modern communications technology, especially focusing on digital forms of communications.

Further, the Morse code requirement should be reduced to the lowest needed to comply with international regulations: 5 WPM for any class of license with privildegas below 30 MHz. However, a "sunset clause" should be introduced that automatically deletes this requirement for

licensing, effective immediately, as soon as the international requirement is removed.

#### Conclusion

I respectfully request that the Federal Communications Commission make haste in amending Part 97 of the Amateur Radio Service rules as outlined in the comments on WTB 98-143 and as in my reply comments above.

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