

To the Ladies and Gentlemen of the Commission assembled, Greetings,

I reply to you today in the matter of the Biennial Review of Part 97 of the Commissions rules.

I wish to address several of the issues of this proceeding:

First is the matter of the continued requirement for the testing of proficiency in the use of Morse Code as a prerequisite for access to the HF portion of the Amateur Radio Spectrum.

The Commission received over 1900 comments during the initial comment period that urged either the elimination of or reducing to a single test element of 5 (five) words per minute for ALL levels of licensure that permit access to the HF spectrum. International treaty presently requires a demonstration of proficiency in Morse Code signals by persons acting as the control operator of an Amateur Station below 30 Megahertz. The United States is a signatory to this treaty.

While many of the comments are persuasive, I point out that the Amateur Service is over 600,000 persons strong, the MAJORITY of whom either felt satisfied with the service as it presently exists or were apathetic to the considerations being made and did not comment. That in itself demonstrates a very vocal minority, (in the matter of persons supporting "no code/low code) but is in and of itself a strong argument for a continuation of Morse Code proficiency testing in that the majority of the Service was not sufficiently motivated to comment one way or the other.

In my initial comments to you I stated then and I urge now that a two-tiered test of 5 (five) words per minute and 12 (twelve) words per minute would be reasonable evidence that the applicant has demonstrated a sincerity and determination to improve his/her skills within the Amateur Service. These speeds would be in common with the CEPT speeds of 5 and 12 words per minute. Many commentators argued that a single examination of 5 words per minute would satisfy this treaty, which is true. But the HF spectrum is a finite and coveted resource, and access to it should be limited to those persons who have an on-going demonstration of desire to improve thier knowledge and skills within the Amateur Service. The proposed four class, tiered system would ensure a reserve of operators committed to the principles of the Service.

Furthermore, a great number of foreign Amateurs either do not posses English skills nor do American Amateurs posses skills in a great many other languages. Morse Code is the common denominator in promoting one of the principle purposes of the Amateur Service, the promotion of international goodwill. It is clearly in the best interests of the Amateur Service that persons who desire to operate on frequencies capable of international propagation demonstrate both a basic and advanced level of proficiency in Morse Code, and that Morse Code proficiency testing be retained.

I further wish to address the comments submitted by the Editors of "CQ Magazine" and "CQ VHF Magazine" that promoted the concept of a "beginners permit" for Primary Education level students. This idea would allow students to obtain a permit that would allow operation on specific bands for the purpose of obtaining experience in Amateur practice, but would not require the presence of a Control Operator at the time of operation.

While I laud the idea of a "permit" for primary school students, I

believe that this concept should be considered on it's own merits and be addressed as a seperate NPRM.

I also wish to reiterate my desire that the FCC enthusiastically embrace enforcement responsibilities and fully exercise that responsibility in order to restore order and a more wholesome enviroment on the airwaves. While this Commentor is well aware of the Constitutionally guaranteed rights to "free speech", too many persons consider the intentional jamming, playing of music, or the liberal use of profanity and graphic comments as "free speech", which to the average listener would be offensive or detrimental to effective and reasonable communications.

Furthermore, I believe in reinforcement of the testing requirements by removing the questions for an Amateur license from the public domain. In doing so, future applicants will be required to truly have a comprehension of the material required, rather than exploiting "Q&A" manuals that presently provide the answers to all of these questions which further promotes simple rote memorization of the questions. This is NOT a true learning process.

Lastly, I believe it would be in the Commission's interest to discontinue the "Sequential Call Sign" system that issues certain format callsigns based upon the class of license. I would think it reasonable for the Commission to SPECIFY the format of callsign based upon class of license, but then allow the licensee to procure a callsign by way of the Vanity Call Sign system. The FCC would issue a primary callsign to all successful applicants from the "Group D", or 2 by 3 format calls.

In summation,

(1) I support the reduction of the number of Amateur license classes from the present six to four, Class D (VHF Only), Class C (entry level HF class that would grandfather present Technician Plus and Novice class operators after an open book test to reinforce knowledge of new privileges granted), Class B, which would combine the present General and Advance Class licenses with expanded HF privileges, and Class A, which would be the equivelent of the present Amateur Extra class license. Class C would require a five word per minute Morse Code Proficiency test while Class B and Class A would require a 12 word per minute test.

(2) I recommend that the Commission seriously consider the concept of a "learner's permit", but that it be considered as a seperate NPRM and include a requirement that appropriately licensed or certified persons be present for the supervision of said "permitee".

(3) That the FCC entusiastically enforce Part 97, and that it support the activities of the Amateur Auxilliary in such a way as to encourage ALL Amateurs to voluntarilly comply with the recommendations of Auxilliary members rather than be subjected to enforcement action.

(4) That the FCC remove all questions used for the purpose of creating Amateur examinations from the public domain and that they be the responsibility of the Commission, the VEC's, and a Commission approved oversight committee. In so doing it will require the applicant truly study the material required for an Amateur license rather than memorizing questions from "Q&A" manuals that are presently prolific.

(5) That the FCC discontinue the present "Sequential Call Sign" system

in favor of specifying the format of allowable call signs by class and permit selection by the licensee via the Vanity System.

Respectfully submitted,

/s/ Steven James Robeson, K4YZ