

Reply to Comments to Amendment of Part 97 of the Commission's Amateur Service Rules, FCC WT Docket 98-143
(electronic comments already submitted by e-mail)

Before the
Federal Communications Commission
Washington, D.C. 20554
In the matter of WT Docket No. 98-143
1998 Biennial Regulatory Review RM-148
Amendment of Part 97 RM -9150
of the Commission's Amateur Service Rules RM-9196

I am an amateur radio operator (KC6WCT) who teaches amateur radio in high school. I would like to reply to the comments of the two largest groups of amateur radio operators I know, the American Radio Relay League (A.R.R.L.) and No-Code International (N.C.I.). Many of their positions are also reflected in the comments of others on WT Docket 98-143.

The comments I would like to reply to concern the ease of entry for the introductory license, the retention of antiquated morse code requirements, and simplifying the structure by reducing the number of license classes to three or less. The fourth section consists of my conclusion.

I. Ease of Entry for Introductory License

Many Voluntary Examiners addressed in their comments a concern that the introductory test was becoming too difficult to sustain amateur radio growth. I absolutely agree with those comments by seasoned testers who are in a position to see the future. The introductory class license must seem realistically obtainable or potential hams will just go to other hobbies. New hams are the lifeblood and future of our hobby. I teach amateur radio at my high school and it concerns me that the written part is now harder than it has ever been before. As commented upon in the September 1998 QST, there are

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now more questions for the novice license alone than there were questions for all the licenses back in 1962. Combining the novice and technician pools for a total number of almost 1,000 questions in the question pool will make it even harder. Contrast that with the 20 questions the potential novice of yesteryear faced. If we are to combine question pools then let us rather combine advanced and extra for more dedicated hams.

Is it really necessary for new hams to chart on graphs safety exposure levels? Would it not be better to just limit the amount of power for the first license (for example, no operations with more than 40 watts of power) and just have some basic safety principles? Such an extensive test section on safety not only is unnecessary and complicated, it gives the false impression that amateur radio is more dangerous than it really is.

If we want to make our hobby attractive to young people they must believe their initial license is realistically obtainable. This means a test easier or at least no harder than the ones we have now. It also means an introductory morse code speed of no higher than 5 words per minute.

As a teacher I can tell you that combining the novice and technician pools or having the first morse code speed test as 12-13 words per minute will significantly lower the number of young people I can introduce to ham radio and may even threaten my whole program. We want and need young people in ham radio. I am not proposing lowering the standards. I am proposing not continually increasing the standards to the point where we lose young people.

I did not see in the position of the A.R.R.L., N.C.I., or any other comments any good reason to maintain the introductory license as the hardest it has ever been in

amateur radio history. I am pleased that the A.R.R.L. has recommended that the introductory license be only a 35 question test. This is a tremendous idea and I enthusiastically support it.

II. Morse Code Requirements

The comments of N.C.I., the comments of the A.R.R.L., your NPRM assessment, and the comments of many others are all correct on the decreasing importance of morse code. Take a look at our military, our merchant marine service, and the amateur radio communities of Japan, Germany, New Zealand, Australia, Switzerland, the United Kingdom, Aruba, and South Africa. If that does not convince you, then just listen to the amateur radio bands.

Even the A.R.R.L. in its comments recognizes the decreasing importance of morse code. Their first proposal reduces the maximum morse code requirements from 20 to 12 words per minute. Their second recent proposal gives new hams CW privileges without first passing a five word per minute morse code test. Both recognize the decreasing importance of morse code. This is true even among the more conservative A.R.R.L. members who want to retain the morse code requirements. In an A.R.R.L. survey of this group about ¾ said they rarely or never use morse code. The A.R.R.L. is an honorable but very conservative organization of increasingly older members. They do not speak for all or even most hams. If amateur radio is to survive as both a hobby and a service for emergencies then it must focus on the new technologies of the future rather than on a mode which was developed over 150 years ago.

One advantage in eliminating the morse code requirements or reducing them to no more than five words per minute would be to eliminate the need for medical waivers.

N.C.I. and I both believe in the lessening importance of morse code and in eliminating it as a license requirement. It is not a matter of lowering standards. It is a matter of modernizing requirements. We no longer teach the reading of the sundial in the public schools. Morse code should be considered as one optional mode of communicating just like any other mode instead of being considered as the most important and vital prerequisite to advancing in amateur radio. There is no evidence that morse code makes an operator more desirable, motivated, or better qualified. Focusing so much effort on the antiquated morse code requirement interferes with the amateur radio purpose of advancing the radio art. I hope you at the F.C.C. take the big long term view of where amateur radio is going and do what is best based upon the future rather than upon past traditions.

III. Streamline and Simplify License Classes

Your N.P.R.M., N.C.I., A.R.R.L., and many other comments all recommend reducing the total number of license classes. Though the A.R.R.L. recommended four license classes (a step in the right direction), the December issue of their journal QST reported that even in the A.R.R.L. there was a heated discussion with an enthusiastic minority pushing for three license classes. I agree with the comments of N.C.I. and many in the A.R.R.L. that there should be just three license classes. I see no real reasons in any of the comments why four classes would in any way be better than three license classes for amateur radio.

Make it easy on yourself. You can reduce the number of license classes on the high end just as easily as on the low end. Reducing the number of classes on the high end is preferable because advanced hams are more motivated and less likely to quit the hobby

than newcomers to the amateur radio service. Given the small difference in privileges, there is no reason not to combine the extra and advanced license. This would leave a novice, general, and advanced license. (I like these names because they are descriptive of the privileges and retain the traditional novice license class.)

Most countries have three or less license classes and there is no reason why we cannot do the same. Until 1936 we had only three license classes and did just fine. The only requirement for testing and a license is to insure minimum proficiency. True proficiency comes with practice, not by taking tests and having the F.C.C. keep track of different classes for the prestige of the operator. Fewer license classes will mean less testing for the VECs, less record keeping for you, and easier enforcement for everyone.

IV. Recommendations

- Make the introductory license easy enough that it is still attractive for young people.
- I do not think there should be morse code requirements. If you decide to keep them, until the next ITU convention the only morse code test should be five words per minute. If the next international convention does away with the requirement of morse code for access to high frequency bands, give consideration to eliminating the morse code requirements altogether. No other mode of amateur radio communication requires any demonstration of proficiency.
- Reduce the number of license classes to three or less.
- Please “grandfather” novices and technician pluses into one of the three license classes (or however many classes you decide to have) so your database will accurately reflect everyone’s status. It is too bulky and cumbersome to say certain people will have certain privileges if they retain the requisite paperwork while not retaining that information in the F.C.C. database.
- As a matter of fairness, no person should lose privileges as a result of the restructuring.
- I would go even farther in allowing testers to test one level below their license. I would allow registered VECs to test up to their level. The only guidelines for VECs giving tests should be that the testers should have at least the requirements of those

they are testing. An extra can already test an extra. An advanced class licensee should be able to test for advanced, a general class licensee should be able to test for a general and a technician class should be able to test for a technician license.

- Give names rather than letters to license classes. I suggest novice, general, and advanced. These would be descriptive of each license and keep the traditional novice name.

Thank you for your consideration. I know you have a difficult job. Regardless of what you do, there will be a lot of work for you and criticism by those who never want to change. That being the case, I hope you move boldly to simplify and keep amateur radio attractive to young people, reflect the lesser importance of manual morse code, reduce the number of license classes, and do whatever else will make your job easier for the long term.

Sincerely,



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