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September 20, 1998

Mr. William Kennard, Chairman F.C.C.
Federal Communication Commission
1919 M Street NW
Washington D.C. 20554

DOCKET NO.
WT 98-143

Dear Mr. Kennard:

Attached is a copy of a letter that I have sent to the American Radio Relay League. The letter concerns my feelings and opinions concerning the licensing of people to send radio signals in open space. Reference to this letter is the league's position that it favors licensing simplification for radio amateurs which will increase the number of radio licensees. I have condensed the letter as follows for your convince. I submit the following most respectfully.

Uncontrolled use of radio transmissions can cause a threat to all of the public. Interference caused by deliberate interfering transmissions or those sent by operators not sufficiently trained can be a be a life threatening event.. Many devices are used to navigate, summon help, monitor crisis and to protect property and life are subject to radio interference, willful or accidental radio interference.

The good offices of the law enforcement division of the FCC is reputed to be restricted to a minimal law enforcement activity. The FCC bureau has been relying on the self policing of the radio frequencies to maintain responsible use of radio transmission equipment. It is imperative that only responsible and trained operators be license to operate under this system. The present testing system does not elevate the standard of applicant, the new proposed system will lower the standard to achieve more operators. Loose control and it will be gone forever.

The American Radio Relay League is not a viable representative to promote good radio frequency operations that is in the best interest of the public. The organization has an invested interest to support many financial and market interests that may wish to lobby for a freer licensing system to increase the operators numbers rather than maintain good control over the radio spectrum. This is a dangerious conflict for an organization that is involved in promoting changes in the licensing rules.

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Sincerely,

Philip C. Howlett

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PHONE: 9045329262 • FAX: NONE

PHILIP C HOWLETT

September 20, 1998

Mr. Rod Stafford, President
American Radio Relay League
225 Main St.
Newington CT. 06111

Dear Rod Stafford:

My letter is in reference to your letter entitled "from the ARRL's President". This letter dealt with restructuring the rules governing the license system for radio hams. I am sorry that I cannot refer to the exact letter for the copy that I received came from you Internet site and it contains no reference identification.

I have taken the time to study your thoughts put forth in this letter, I must say I am completely amazed at the logic that you use to support the position that the ARRL as taken to bring about a more simplified license structure for the amateur radio hobbyist. Let me first tell you that I am not against the simplification of these rules, nor am I a great supporter of digital communications, being that of manual Morse code method using a continuous wave or a computer generated digital system using other transmission methods.

You state that you met an old ham that claimed to be an electrical engineer and once was a "ham" who was surprised that SSB is still used as a communication method on HF radio. I certainly do not believe that this chance meeting with such an individual is important to this issue. You have no idea as to this persons qualifications to comment on the subject of need for a more advanced transmission methods nor did he seem to be able to suggest any new systems to you. Therefore I will not waste time commenting on your thoughts in this paragraph. It has nothing to do with the need to restructure licensing.

In the second paragraph you state that the technology curve has past amateur radio. My first thought is to excuse you for you lack of knowledge concerning the activities that QST regularly publishes such as, moon bounce, satellite transmissions, television, computer generated digital systems and many more such activities. The use of radio wave transmission really has not changed from the very first time that Armstrong and others first used it. It is governed by physics, the process of generating the signal has changed. The modern ham transmitter, costing as much as $5000, is no less a highly development piece of technology. You are very wrong to isolate Morse code, define by you as ***Continuous Wave***, as proof of the backward development in the hobby of ham radio. Morse code is the only digital system that is understandable by the human mind without the aid of complicated computer hardware. This has many important advantages, a simple example is that it provides a simplistic way for an individual to enter the hobby.. Out side of Boston, in other countries, in the home of a young boy in the country side of America, it is important. It is still the easiest way to start the hobby on a Mac Donald's budget. I really wonder why you continue to bash Morse code. It is simply another phase of a hobby that is enjoyed many people, an is required by others because of physical handicaps. Why is it important to the ARRL to eliminate Morse code?

I read that you stated that the number of people in this hobby has not grown, yet I have the call books from 1951 and 1995. I observe a considerable difference in the thickness of the two books. I

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PHONE [illegible]

do not think it is even necessary to look up the numbers to know that more people are now licensed as radio amateurs at this time than anytime in history. The argument that "more radio operator the better for the hobby" is a completely unsupported statement. It is not the number of people that is important to a healthy radio hobby but rather the quality of the hobby that is important. The hobby has survived because of self policing by the hams for the FCC no longer enforce the rules. Why do these hams guard the hobby so fiercely? ***Because the privilege to operate on the radio was achieved with a certain difficulty that causes a brotherhood to exist*** This system of a brotherhood is as old as mankind. It can be seen in many social groups in your everyday life, such as the alumni society of your University. Allow those to join that did not meet the University requirements and the of the group devolves, it will have no meaning to exist. If amateur radio is to survive it must maintain a meaning, such as a bar to hurdle to join the fraternity. To lower the bar will not make the society improve it may destroy the hobby. This is not to say that Morse code is the only way to maintain the needed hurdle, but Morse code is a hurdle that is a true measure of ***commitment*** to the hobby. To some it equates to the climbing mount Everest. The other present multiple choice tests are not such a commitment.. The multiple choice test system, (answers in hand), and the other abuses of the testing system do not properly qualifying the applicant. There is great danger that the activity on ham radio will degenerate to the level of other unregulated radio services. ***This is the real threat to the hobby***. You say that Morse code skills are unnecessary in a modern amateur radio hobby. I say to you that there is no negative aspect to learning new disciplines even if it is Latin in engineering school or Morse code for amateur radio.

You claim that the ARRL has no interest in the sales of amateur radio equipment. This is a completely unfounded claim. One only needs to count the pages of advertisements in QST, compare that to the pages of technical writings to see where real power lies with the ARRL. The money income from this source is very important to your league. The sale of amateur radio equipment is important to all of us. There is no doubt to me that QST has lost its identify with the ham radio hobby, it has become a lobbyist for the equipment market. You have stated that the hobby is an old mans hobby, which it always was. I ask you how can a high school age person, working at Mac Donald's, purchase a radio station requiring a years pay and adding a membership to the ARRL which requires another weeks pay? You propose a higher technology at a higher equipment cost for ham radio equipment for hobbyist that balk at the price of a common place $2000 transceiver. I cannot think of one young person that I know who will spend several thousands of dollars for an advanced radio system when given option of joining his multitude on the Internet with a $900 computer.. Nor can I visualize that a new technology will replace the SSB system when one considers the tremendous cost required by all hams to be involved in the new technology. The ARRL certainly does not understand the forces that drive a market. I think the ARRL is behind the curve of technology. It is not possible for the ARRL to bring more complex technology to a market that does not understand nor want the product. The ARRL needs to concentrate on the technical level of the potential customers in that market. Raise the knowledge level of the customer in market and that will drive the demand for advance technology. Assume that amateur radio exists because of the numbers of members and you will destroy hobby.

Allow me to provide you with some of my insight into the hobby that might cause you to think differently concerning the mission of amateur radio and QST.

The survival of amateur radio depends solely on the hobby to achieve self control without the support of government enforcement of the rules. To accomplish this it is necessary to insure that those licensed to operate are of the highest quality individual. The only issue concerning the test requirement is that it provides a pride of achievement to cause a fraternity to develop that will

protect that achievement. The present written technical test do not provide that process at this time. Quality first.

Large numbers of license operators will not provide the guarantee that the hobby will propagate. The frequency space is already over occupied causing "radio wars" that degrades the hobby. The hobby is now threaten by a new and more affordable communication system, the computer. There is no reason to enter the radio confusion existing on ham radio when on can work around the world on computer TV without constant QRM, filthy language, name calling and RIF problems. My grand son will never enter this hobby. The dialog used on ham radio is not suitable for a young person. This is a sad statement to make. I think he is much better on the computer where we have at least have some control of his activities. I have purchased him a new computer rather than give him the radio laying in the closet. ***This is the greatest single danger to the ham radio hobby.***

Bring organization and pride to the hobby of amateur radio by providing a sound foundation through the licensing of qualified people. Forget the issue of number of licensed hams, think about the quality of the hobby. Do not fall for the false assumption that a failure is apparent if the cell of ham radio fails to grow in numbers. If the hobby is controlled, fun, and organized the numbers of hams, the equipment technology, and the health of the hobby will blossom.

Sincerely,

Philip C Howlett
N9BV

CC FCC