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Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

IN THE MATTER OF

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

WT Docket 98-143

REPLY COMMENTS OF

DATE: January 5, 1998

Michael J. Dinelli, N9BOR
9423 Kolmar Ave.
Skokie, IL 60076-1321

I file these reply comments on January 5, 1998, regarding the FCC's proposed *Amendment of Part 97 of the Commission's Amateur Service Rules*, WT Docket 98-143. I appreciate the opportunity to offer my reply comments in this matter. My goal in making these reply comments and my original comments are to:

1. To increase technical proficiency and operating skills, and encourage upgrading;
2. To encourage use of digital modes over less-challenging modes such as SSB and FM;
3. To reserve HF voice modes and power output privileges as incentives to upgrade.
4. To reform the testing procedures; and
5. To reverse the 11-year trend to "dumb down" the license exams.

INTRODUCTION

A number of the comments that I have read regarding this docket have been from people and organizations that have a pecuniary interest in amateur radio. These are the comments that I would like to reply to. I believe that these entities can be the most damaging to amateur radio because of their desire to profit from their proposed changes to the amateur service. Their underlying motivation is to sell more books, magazines, advertising, radios and memberships.

I have no objection to firms that want to engage in the business of providing products or services to amateur radio operators or prospective operators. As a small business owner, I understand that sales are important. I do however, oppose those with amateur radio business interests speaking with authority on this important issue. There is no doubt in my mind that this represents a serious conflict of interest.

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JAN - 8 1999
FCC MAIL ROOM

WT Docket 98-143
Reply Comments by: Michael J. Dinelli, N9BOR
01/05/99 - Page 2 of 10

I continue to support the comments that I filed with the FCC on September 5, 1998. My comments are similar to those filed by Alan Wormser (N5LF), Fred Adsit (NY2V), Tim Billingsley (KD5CKP) and others. These proposals are the **only** ones that I have found that clearly emphasize and encourage the use of modern digital modes. They stress technical skills over merely operating radio equipment. Please understand that these comments were made in response to the FCC's NPRN WT Docket 98-143 and already represent a compromise to accommodate the goals of the FCC.

**OPPOSITION TO COMMENTS FILED BY
THE AMERICAN RADIO RELAY LEAGUE
DATED DECEMBER 1, 1998**

The American Radio Relay League (ARRL) claims to represent over 160,000 members on this and other matters relating to the amateur service. However, while I am a life-member of the ARRL, they do not represent my interests in this and certain other matters. Amateur radio operators join the ARRL for many reasons. It should be noted that in order to subscribe to QST magazine, the ARRL mandates that you become a member. If you want to participate in many of the oldest and most desirable amateur radio awards (e.g. DXCC, WAS), the ARRL requires you to become a member. If you want to participate in their QSL bureau, they mandate that you become a member. As you can see, there are reasons for joining the ARRL as a "member" while still not agreeing with their business or political philosophy.

The ARRL, as publisher of QST magazine is required to submit information each year to the U.S. Postal Service. In the ARRL's report, dated September 29, 1998 the average number of copies of each issue during the preceding 12 months was 154,470. The actual number of copies of a single issue published nearest to filing date was 149,520. This suggests that the ARRL's membership is shrinking. If you are a member of the league you automatically receive a subscription to QST magazine. In fact, the stated allocation of their annual "membership" fee is 50% for QST magazine and 50% for league membership.

In addition to QST magazine, the ARRL publishes other periodicals and many books related to amateur radio. Like many businesses, they advertise their products regularly in magazines, direct-mail marketing and the Internet. Their web site has a "members-only" area to further encourage membership sales. Pecuniary interests taint amateur radio. No organization that sells memberships and publishes periodicals, books and license study manuals can claim to be unbiased. The league is apparently suffering from a shrinking membership and can not help but feel the pain. In my opinion, their motivations are not pure. I suspect that ARRL membership will shrink even more as a result of their comments filed with the Commission. In my opinion, they are not representing their membership on this issue.

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RECEIVED
JAN - 8 1999
FCC MAIL ROOM

WT Docket 98-143
Reply Comments by: Michael J. Dinelli, N9BOR
01/05/99 - Page 3 of 10

The comments filed with the FCC and the materials used to support their ideas are in conflict with each other. Rod Stafford, the ARRL's president published a letter on their web site describing their motivation for their restructuring proposal. His letter states that we should encourage modern communication modes and bring amateur radio into the 21st century. He stated that radio amateurs should be utilizing modern digital modes, instead of antiquated CW, FM and SSB. However, the ARRL proposed to the Commission that 125 kHz already allocated for CW/Digital modes be converted to antiquated phone modes instead of remaining for digital use. This is in direct contradiction to Stafford's explanation. The letter may be read in its entirety at: <http://www.arrl.org/news/restructuring/> The Dinelli - Wormser - Adsit - Billingsley proposals encourage digital communications and experimentation.

The ARRL also proposes that no-code tested technician class radio amateurs have what is essentially general/advanced class HF, CW privileges. This is in violation of International Telecommunication Union (ITU) regulations, in article 32/S25.

2735/S25.5

§ 3. (1) Any person seeking a licence to operate the apparatus of an amateur station shall prove that he is able to send correctly by hand and to receive correctly by ear, texts in Morse code signals. The administrations concerned may, however, waive this requirement in the case of stations making use exclusively of frequencies above 30 MHz.

The following explanation is excerpted from an article which quotes David Sumner, K1ZZ, publisher of the league's QST magazine and ARRL Executive Vice-president. View the article at: <http://www.arrl.org/members-only/extra/news/1998/1026/1/>

Addressing the Morse code requirement in the International Radio Regulations, Sumner summed up the Board's position by saying that the new privileges would amount to self-testing. "By their very nature, you can't use the privileges until you know the code," he said. "We're not expecting the CW bands to be overrun with people taking advantage of this, but as any CW operator knows, the best way to become proficient in the code is to use it on the air."

There are a number of problems with this thinking. Using modern computer encoding and decoding, Morse code telegraphy can be used by individuals having no proficiency whatsoever. This would violate even the ARRL's creative idea of "self-testing." David Sumner explained to me by e-mail correspondence that the FCC is already in violation of this regulation because they do not require a Morse sending test. However, it is reasonable to assume that if one can "receive correctly by ear, texts in Morse code signals" that they can also "send correctly by hand." In the modern computer age we live in, it is not reasonable to assume that if one can use Morse code that they can meet the ITU Morse test requirement even with this creative thinking. The ARRL is proposing a no-code tested digital license with HF access under the guise of "self-testing." Please note that while computers *can* be used to communicate using Morse telegraphy, they can *not* compete with a human brain under less than ideal conditions or with non-computer generated code.

It is my desire to grow amateur radio responsibly without sacrificing the goals of the amateur service.

MD

RECEIVED

JAN - 8 1999

FCC MAIL ROOM

WT Docket 98-143

Reply Comments by: Michael J. Dinelli, N9BOR

01/05/99 - Page 4 of 10

Part 97.1 A. *Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.*

The International Morse code is relevant to meeting Part 97.1 A. Telegraphy represents the lowest common denominator for communications in the amateur service. The ability to turn a RF signal on and off to form characters is a relatively simple task when compared to configuring radio equipment for other modes (e.g. digital, SSB, FM, RTTY, etc.). Simple and inexpensive CW only transceivers can be constructed by using kits commonly sold to QRP (low power) amateur enthusiasts. In fact, the ARRL lists 13 manufacturers of QRP kits on their web site. This equipment also offers low power consumption and can be operated under less than ideal conditions.

On Christmas day, I had a telegraphy contact with ARS KF8LO in Flintville, TN. He was powering his CW transceiver with a battery because an ice storm had caused a power outage in his community. His station was located in his bedroom where the temperature was 45 degrees. We chatted for about 30-minutes until he decided he wanted to warm up in his living room where he had a kerosene heater warming the house. Low power SSB transceivers could not compete with similar power consumption and still enjoy the same communications ability. The power consumption is so low on CW QRP radios that some radio amateurs have utilized solar power and wind power to charge their batteries to operate. This completely eliminates the need for commercial power for long distance communication in times of dire need.

Jake Carter, N4UY of Vienna, Virginia had a CW contact with Will "Doc" Lindsey, K0EVZ in Rochester, Minnesota on December 30. Doc was 859 miles away from Jake. Jake was using a \$10 Pixie CW transmitter kit powered by a 9-volt battery. The Pixie's power output is between 250 and 300 mw, which equals about 2500 miles per watt and was accomplished with a simple 40-meter wire dipole antenna. This could not have been accomplished using phone. Milan, OK1DMP (Czech Republic) has communicated with more than 130 different countries using a power output of 900 mW. This also could not have been accomplished using phone.

Part 97.1 B. Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.

As stated above, equipment necessary for long distance telegraphy communication is simple. However, many radio amateurs have chosen to purchase commercially made equipment where little experimentation can be made due to the complexity and necessary test equipment that would be required. As a result, these radio amateurs have been called "appliance operators" because their ability to build, test and experiment with radio equipment has ceased to exist with modern commercial radio gear.

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RECEIVED

JAN - 8 1999

FCC MAIL ROOM

WT Docket 98-143

Reply Comments by: Michael J. Dinelli, N9BOR

01/05/99 - Page 5 of 10

Simple CW transceivers are available in kit form by many different manufacturers (e.g. Ten Tec, Oak Hills Research, Emtech). There are a number of publications that offer relatively simple QRP projects which helps radio amateurs learn more about electronics and the radio art. For about \$100 you can purchase a low power CW transceiver kit from an American firm. These kits are suitable for people with limited test equipment and electronics knowledge. They serve to advance the radio art by providing new electronics skills to amateurs and a better understanding of how they operate. Accessory projects are also available for electronic telegraphy keyers, digital frequency readouts, antenna tuners, etc. to continue the learning process.

My radio friend Rick Weber/W9QZ obtained his amateur radio license less than a year ago at age 54. He had no prior electronics or radio experience. In his short tenure he has built several kits and radio projects from scratch. He earned his extra class license and in this short amount of time his ability to copy Morse code by ear already exceeds the 20 w.p.m. requirement.

Part 97.1 C. Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communications and technical phases of the art.

The ARRL proposes to "de-emphasize" CW, the lowest common denominator for communications via amateur radio. Radio amateurs continue to advance the radio art without any de-emphasis on this needed skill and communication mode. Radio amateurs are building and sending satellites into space, bouncing their signals off of the moon (eme) and talking to astronauts on Mir. We operate many different digital modes and even use amateur television. Many radio amateurs are utilizing "outdated" modes like CW, SSB, AM and FM because they work well and are relatively inexpensive.

The ARRL proposes to convert 125 kHz of bandwidth currently allocated for CW and modern digital modes to phone use. This change would be contrary to the purpose of advancing the amateur service. The ARRL merely seeks to increase the number of radio amateurs by lowering licensing requirements. Many refer to this as the "dumbing down" of amateur radio. The promotion of school children to the next grade level without acquiring the necessary skills has long been looked at as counterproductive. This is generally done as a cost saving method for the school systems, not to benefit the children. The ARRL is proposing to dumb down the amateur service, which may increase the amateur population for awhile, but it will not add anything to it other than a less skilled operator.

Our current licensing system allows more privileges with more skill and knowledge. Gordon West, WB6NOA writes in his "Advanced Class FCC License Preparation" book, published by Master Publishing, Inc., "incentive licensing strengthens the amateur service by offering more privileges in exchange for more electronic knowledge." As a technician class radio amateur you can use voice, digital communication, bounce signals off of the moon and communicate with the Mir space station. This can all be accomplished today without a telegraphy examination. As you advance your skills from a no-code technician and learn radio and different communication techniques and you acquire proficiency in International Morse code, you gain access to more frequencies. The more you learn, the more you get.

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RECEIVED
JAN - 8 1999

FCC MAIL ROOM

WT Docket 98-143

Reply Comments by: Michael J. Dinelli, N9BOR

01/05/99 - Page 6 of 10

Part 97.1 D. Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.

A trained amateur radio operator is one that is proficient in the use of many operating modes including telegraphy under adverse conditions. Ron Keener, WA0REE of Leander, Texas found out how valuable his telegraphy skills are last September during Hurricane Georges. Ron was on the air in conversation with Julio, CLxxx (Cuba). They operated in less than ideal conditions on 40-meters in the novice subband. There was lots of static and other interference that night. Cuban amateur radio operators usually use very simple and inexpensive equipment. In fact, many Cuban radio amateurs build their own equipment using discarded TV parts. The following is an excerpt from Ron's account of that night:

i got on my normal frequency of 7111 about 0050z last night - the band was noisy with lots of qrn and qrm - finally ended up calling cq on 7110.60 - i heard a familiar weak chirpy signal come back to me

it was julio CLxxx returning my call - i have had several qso's with julio but have never had a COMPLETE qso because of his weak signal and various forms of noise interference - he uses a 10 watt russian rig and has a poor antenna system - at best his signal is S3 into texas - last night he was S1 to S2

for those unfamiliar with the 7110 area there is a foreign broadcast station that transmits from 0300z to 0330z - julio and i were fighting that qrm - i did not want to try a qsy for fear that i would loose him

Julio told Ron that he needed his help desperately. Julio's wife, Aida, was in terrible pain and needed Kenalog 40 for injection. She couldn't move her right arm at all. Julio explained that Kenalog is a steroid for Aida's shoulder. Through a series of phone calls, Ron was able to reach the Red Cross in Cuba. Because of the language barrier, it took Ron 15-minutes to convey Julio's situation to the Cuban Red Cross representative.

Ron got back on the air and contacted Julio to tell him that he spoke with the Red Cross. Ron asked Julio if he still had phone service. Julio responds that he doesn't have a phone. The entire communication between Ron and Julio lasted until 0413 Zulu, over 3 hours duration. Julio in Cuba used his chirpy 10-watt telegraphy signal to obtain help from a radio amateur in Texas under adverse operating conditions in the middle of a hurricane.

The ability to copy International Morse code under these conditions was necessary when all Julio had was a 10-watt CW transceiver and a poor antenna system. The ability to copy even slow telegraphy under these conditions is very difficult. A trained amateur radio operator who is able to copy high-speed code (20 w.p.m. and higher) is better able to copy by ear under adverse conditions than someone only proficient at 5 w.p.m., even at slower speeds. A human brain is far superior to any computer decoder of Morse under these conditions too.

MD

RECEIVED

JAN - 8 1999

FCC MAIL ROOM

WT Docket 98-143

Reply Comments by: Michael J. Dinelli, N9BOR

01/05/99 - Page 7 of 10

The ARRL proposes to de-emphasize telegraphy with 0, 5 and 12 w.p.m. tests as opposed to the current 5, 13 and 20 w.p.m. requirements. This is wrong and does not follow the basis and purpose of the Amateur Service as outlined in Part 97 of the rules and regulations.

Part 97.1 E. Continuation and extension of the amateur's unique ability to enhance international goodwill.

A few weeks ago there was a CW contest. It filled the CW/digital subbands with telegraphy signals from all over the world. These ops were not sending at 5, 13 or 20 w.p.m. Most were well above the current fastest telegraphy requirement. There were absolutely no open frequencies to operate CW. I can get on 40-meters at any time of the day or night and find many radio amateurs to communicate with in international Morse code.

In addition to being able to communicate beyond the barrier of one's own language, CW transcends age. I can't tell if I'm talking to someone that is 10 or 97 (that's the current age range that I've talked with that I'm aware of). Likewise you can not detect one's accents, ethnicity or speech impediments with cw. I have even conversed with severely disabled radio amateurs that blew into a straw to form telegraphy characters. Telegraphy is pure communication and should not be de-emphasized. I understand that many hearing-impaired radio amateurs that are unable to carry on a voice contact are able to use and understand Morse telegraphy. There is even a research project called Morse 2000. This program is a collaborative effort of the University of Wisconsin-Eau Claire School of Nursing/Human Sciences & Services Outreach, the Johns Hopkins University Center for Technology in Education, and the Trace Research and Development Center at UW-Madison. The Morse 2000 Worldwide Outreach promotes research in and use of Morse code in rehabilitation and education.

Radio amateurs use Q-signals to communicate via telegraphy to amateurs that do not speak their own language. For example: QTH means, "my location is ___" and QSB means "your signals are fading." Telegraphy breaks the language barrier of speech. For example, I have conversed with several amateur radio operators in Cuba and I speak no Spanish.

Here's an example of a telegraphy communication with a Cuban station:

CO2BCC de N9BOR r BT ur rst 459 459 OM BT QTH Chicago Chicago BT Op Mike Mike. BT Hw? CO2BCC de N9BOR kn

Here I tell the Cuban station that I received his last transmission and his signal is readable with practically no difficulty. His signal strength is fairly good and his tone is pure with no trace of ripple or modulation of any kind. My location is Chicago and my name is Mike. How do you copy my signals? Then I turn the conversation back to him and him only.

At 20 w.p.m. this only takes a short amount of time even with repeating the most important elements of the conversation. He can understand exactly what I am saying without having to understand English.

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RECEIVED

JAN - 8 1999

WT Docket 98-143

Reply Comments by: Michael J. Dinelli, N9BOR

01/05/99 - Page 8 of 10

FCC MAIL ROOM

Please do not accept the ARRL's proposal to dumb down the amateur service. Please do not reform the novice CW/digital subbands to phone modes. Talking requires no additional skill for examination. Please do not reduce the Morse proficiency requirements because we know that if all else fails, we can touch two wires together, call for help and someone will know what it means at the other end.

Please review the enforcement complaints that the FCC receives. How many complaints are involving radio amateurs operating CW compared to phone or other modes? I have been a licensed radio amateur for 18-years and never heard a profane word using telegraphy. On Christmas day, I tuned around on 2-meter FM and found a conversation that was filled with foul language. Both parties had no qualms about identifying with their amateur radio callsigns. This is not an isolated event either.

If restructuring promotes current amateurs to the next "grade" without acquiring additional skills and add to that the limited resources of the FCC to enforce the regulations, you have created havoc. We already have the Citizens Band. The lack of enforcement there created a mess of what was once the 11-meter amateur radio band. We saw popular songs and movies made about the madness of CB. We also have the family radio service for those that are not pursuing the technical interests of radio.

Please expect the best from amateur radio operators so that when an emergency occurs, skilled operators are there to assist. Please also provide us the opportunity to assist by not allowing unskilled operators to advance without study, practice and testing. The ARRL has done many wonderful things for the amateur service however, their restructuring proposal filed with the Commission is not one of them. I believe that the ARRL's board responded to their own internal problems in their comments filed with the Commission. It is interesting to note that while the ARRL membership erodes, the FISTS CW club has experienced a 300% increase in membership since 1996. <http://www.fists.org> The goals of the FISTS CW club are simple: 1. To further the use of CW on the amateur bands. 2. To encourage newcomers to the CW mode. 3. To engender friendship within the membership.

OPPOSITION TO COMMENTS FILED BY

NO CODE INTERNATIONAL (Fred Maia, W5YI), CQ MAGAZINE (Fred Maia, W5YI), NATIONAL CONFERENCE OF VECs (Fred Maia, W5YI), MASTER PUBLISHING, INC. (Fred Maia, W5YI)

For some reason wherever there is a fight to remove telegraphy from the amateur service, Mr. Fred Maia, W5YI is somewhere nearby. Mr. Maia is on the board of directors of No-Code International and in fact is both the billing contact and administrative contact for its Internet domain "nocode.org." He is also involved with CQ magazine and has authored no less than ten articles under the "legal" heading during 1998. These were articles related to amateur license restructuring and FCC related issues. Further the comments sent to the Commission from Master Publishing, Inc. were addressed to Mr. Maia (their customer) rather than the FCC. Mr. Maia is also Chairman of the Rules Committee for the National Conference of VECs and was the only signor for their comments to the Commission. The mailing address for the National Conference of VECs is shared with Mr. Maia's W5YI Group, Inc. business address.

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18N - 8 1999
FCC MAIL ROOM

WT Docket 98-143
Reply Comments by: Michael J. Dinelli, N9BOR
01/05/99 - Page 9 of 10

It is my understanding that Mr. Maia owns "The W5YI Group, Inc." which markets books, software, audio and videotapes for amateur radio license preparation. The W5YI Group had four advertisements in the December 1998 issue of CQ magazine for their license study products including those authored by Gordon West, WB6NOA which are published by Master Publishing, Inc. The W5YI group also offers through direct marketing, amateur radio license renewal services for a fee.

No-Code International states in paragraph 16 of their comments, that Morse is virtually never used in emergency/disaster communications. This is simply not accurate. Morse communication is needed for less than ideal conditions. My examples listed above of low power consumption, simple equipment and the limited resources of certain individuals demonstrate that telegraphy is extremely valuable today. When conditions worsen during a SSB contact, skilled operators can and do switch to CW to pass the traffic. Bruce Hopkins, KL7H ran a multi day CW contact with a family in Bush Alaska several years ago where the daughter's life was saved by amateur radio and CW. Radio amateurs must possess telegraphy skills to fulfil the basis and purpose of the amateur service.

The more sophisticated the systems we have, the more prone they are to failure. A few years ago a fire in a telephone switching station caused hundreds of thousands of individuals and businesses to go without phone service for weeks. This occurred in the heavily populated suburbs of Chicago. Recently there was an unexpected problem with the Galaxy V communications satellite causing television and paging systems to become inoperative. This disruption affected all of North America.

Simple CW transceivers are the lowest common denominator and do not rely on satellites, complicated electronics, commercial power or telephone service. They do however, rely on the human brain for the conversion process. This is a valuable skill that can be easily learned with practice. A purpose of the amateur service is to maintain a *"reservoir within the amateur radio service of trained operators."* These goals are only met with radio amateurs having a demonstrated proficiency in Morse code.

The May 1998 issue of Worldradio wrote: On 31 December 1997, just minutes before the British government ended Morse code monitoring of 500 kHz at shore stations, a freighter in the North Atlantic, the Bahamian M/V Oak, a 13,000 ton freighter carrying a cargo of wood sent an "SOS" using Morse code. "SOS SOS This is Oak. Position 53 16N 24 50W Stop Engine. We need assistance." The ship was in heavy seas, and the cargo had shifted. She also lost power, and was sinking. The call was answered by a British shore station and a Royal Air Force "Nimrod" was soon orbiting overhead. The crew abandoned the ship shortly thereafter, and was rescued.

The amateur service should not de-emphasize or eliminate proficiency requirements in this valuable skill. The fact that commercial services have eliminated telegraphy is even more cause for the amateur ranks to be able when called upon. The amateur service should not be converted to a recreational hobby. In my opinion, Mr. Maia, NC-VECs, CQ Communications, Master Publishing Inc., Kenwood Corporation and others express their belief that the amateur service exists as a means to provide customers. Mr. Maia, CQ Communications, and others cite statistics indicating that the amateur population is in decline for the past 5 years. However, using the same figures that Mr. Maia uses, it is apparent that the overall population of licensees has grown at roughly 2 to 5 times the general US population since 1970.

MD

RECEIVED

JAN - 8 1999

FCC MAIL ROOM

WT Docket 98-143

Reply Comments by: Michael J. Dinelli, N9BOR

01/05/99 - Page 10 of 10

Maia (in the NC of VECs) argues that currently there are one-third "no code," one-third "slow code" and one-third "fast-code" operators in the amateur service. He is basing his argument on the current class of license that amateurs hold. I have worked novice and tech plus licensees at over 20 w.p.m. and I hold a license that only requires 13 w.p.m. proficiency. With propagation improving on the HF amateur bands, I have seen many people return to amateur radio after a long time lapse. I have found that even if they have not used their telegraphy skills for many years, it is not lost. They may have to practice for awhile to regain their old level of proficiency, but they are still able to use their code skills immediately even after years of inactivity. Likewise an amateur radio operator that chooses to use modes other than CW for many years will still have the skill should an emergency situation cause the need for it.

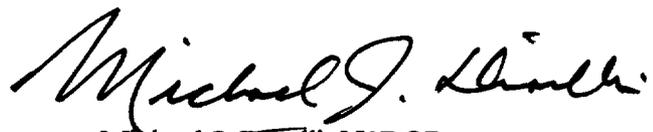
Peter Trotter, Vice President of Master Publishing, Inc. writes to Mr. Maia about the timing of such proposed license changes. Mr. Trotter is concerned about having changes occur before he is able to sell off his existing inventory of license study materials. His restructuring comments seem to otherwise echo those of Maia's. This is not surprising as Trotter states that the W5YI Group is a customer of Master Publishing, Inc.

SUMMARY: SUPPORT FOR DINELLI, WORMSER, ADSIT, BILLINGSLEY, AND OTHERS

- Beware of people and organizations that stand to benefit financially by modifying part 97 to their liking.
- Merge Technician Plus and Novice into an Intermediate Class with digital emphasis.
- Enhance technical questions on the exams.
- Maintain the current 3 levels of CW examination.
- Release the Novice subbands to Digital/CW.
- No longer allow examinees to test twice in the same VE session.
- Change waivers to include FCC review and certification.

I hope that the Commission finds these comments useful. As an individual without pecuniary interests in amateur radio, much time has been devoted to its preparation. Thank you for the opportunity to offer reply comments on Docket 98-143.

Sincerely,



Michael J. Dinelli, N9BOR
9423 Kolmar Ave.
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January 5, 1998