

Brief Comment on 98-143
submitted by Bradley A. Farrell,
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I support the Federal Communications Commission proposed framework to restructure the Amateur Radio licensing system so that the number of license classes would be reduced from six to four.

I oppose any proposal to eliminate or significantly reduce the Morse Code proficiency requirement for Amateur Radio licensure.

I oppose the FCC proposal to allow Novice operators to use all Morse code bands. Novice operators should be limited to using General class Morse code sub-bands at 200 Watts maximum output power.

I. PROPOSALS THE FCC SHOULD CONSIDER:

I propose that the FCC require Morse code proficiency at ten (10) words per minute for General and Advanced class privileges. The current thirteen (13) word per minute requirement should be eliminated.

I propose that the FCC require Morse code proficiency at fifteen (15) words per minute for Extra class privileges.

II. Opposition to Other License Restructuring Proposals

I oppose, in all respects, proposals to restructure the Amateur Radio license framework submitted by the American Radio Relay League, No Code International, and CQ Magazine. All three proposals propose to significantly reduce or eliminate the Morse Code proficiency requirement for Amateur Radio testing, which, for reasons stated below in Section IV, would significantly harm the Amateur Radio Service.

III. Retaining Morse Code Proficiency Qualification

The Morse code proficiency requirement for Amateur Radio should be retained for several reasons:

1. Morse Code requires only simple transmitting equipment and has, time and again, proved to be a reliable means of communication in emergencies when other modes of communication have failed.

2. Morse code bridges the language barrier in international communication.

3. Morse Code acts as a screen to keep illegal conduct off the Amateur Radio bands, conduct the FCC has dealt with in recent enforcement actions. Observance of FCC regulations on the Citizen Band was destroyed by widespread unlawful operations. Amateur Radio is too valuable a resource to permit such conduct to diminish the viability of this public service.

Amateur Radio operators have, for eighty years, provided exceptional and valuable public service through emergency communications in

times of disaster. Amateur operators purchase and maintain their own equipment and operating facilities without government support, and pay their own license fees. They do this because they are dedicated to providing an important public service. I urge the FCC to retain the Morse Code testing requirement for Amateur Radio licensure in order to preserve the integrity of this public service for many years to come.

Thank you for considering my comments.

Respectfully submitted,
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-END OF BRIEF COMMENT-