Kenneth S. Cannaday
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January 13, 1999

RECEIVED
JAN 14
FCC MAIL

Federal Communications Commission
Office of the Secretary
Room TW-A325, The Portals
445 Twelfth Street, S.W.
Washington, DC 20024-2101

RE: WT Docket No. 98-143

Dear Secretary:

Enclosed for filing are an original and four copies of my formal Reply Comments in the referenced docket number. Also enclosed are a "stamp and return" copy of my comments (first page only) and a post-paid return envelope.

Thank you for your assistance in this matter.

Very truly yours,

Kenneth S. Cannaday

Enclosures: original and four copies
stamp and return page
post-paid return envelope

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20544

RECEIVED
JAN 14
FCC MAIL ROOM

In the Matter of	)	
	)	
1998 Biennial Regulatory Review --	)	
Amendment of Part 97 of the Commission's	)	WT Docket No. 98-142
Amateur Service Rules.	)	

To: The Commission

KENNETH S. CANNADAY'S
REPLY COMMENTS TO COMMENTS OF THE AMERICAN RADIO RELAY LEAGUE, INCORPORATED

Kenneth S. Cannaday
1929 Ewing Avenue
Charlotte, NC 28203

1-704-372-8551 (voice or FAX)

January 15, 1999

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SUMMARY

I, Kenneth S. Cannaday, a licensed amateur radio operator, hereby submit my comments in reply to the *Comments of the American Radio Relay League, Incorporated* (the "ARRL Comments"). The American Radio Relay League, Incorporated (the "ARRL" or "League") is the national association of amateur radio operators in the United States. As such, its comments and proposals in any regulatory matter affecting the amateur service ordinarily reflect the collective opinion and best judgment of the amateur radio community. In this proceeding, however, they do not.

This matter involves the possibility of a complete rewrite of the license structure of this service (with regard to High Frequency privileges only). The League has repeatedly acknowledged that there is no more emotional and divisive issue within the amateur service. No regulatory matter affects the quality and mission of this service more than the standards of operational and technological competence required of the various classes of licensees. Any licensed amateur has the ability to: (1) destroy the communication opportunities of other amateurs; (2) undermine the international good will that amateurs seek to enhance; (3) interfere with public service and emergency communications; and (4) damage the relationship between the amateur service and the greater community within which it exists by causing interference to his neighbors and being technically incompetent to resolve such interference. Licensing standards also affect the ability of the service to obtain effective enforcement of its rules, for the reason that an amateur whose license represents a relatively high level of achievement has more to lose as a result of any violation. Therefore, this proceeding is likely to be the most important Rule Making affecting the amateur service in decades; perhaps the most important rule making ever for this service.

The League's Board of Directors has filed Comments wherein it proposed a comprehensive license restructuring scheme. The Board's scheme contains a radical reduction in testing standards for the two most important classes of licensee: the general and amateur extra classes. The Board's scheme was preceded by a two year period during which the League studied the issues, surveyed amateur opinion, and in 1997 proposed a comprehensive license structure simplification plan that was well received by the amateur community (the "Committee plan"). The Committee plan maintained reasonable licensing standards while otherwise addressing all of the League's concerns referred to in the ARRL Comments. During the two year study period, the League and its officers and Directors repeatedly reassured members that the League intended to "hold the line" against the trend of declining licensing standards. (Such trend has, until now, related primarily to testing mechanics and to the substantive content of the written theory examinations. Many amateurs believe that a decline in licensing standards has eroded the quality of this service since "incentive licensing" was instituted in the 1960's.) In particular, the League and its officials reassured members that Morse Code testing standards would not be significantly affected in any plan the League might propose or support. In July, 1998, the League's Board suddenly reversed directions and unilaterally proposed its current scheme wherein licensing standards are radically undermined. The Board formulated this scheme out of

"whole cloth" in a hastily conducted and chaotic one day session in July. For reasons that the Board has never formally explained, its current scheme does not contain a single element of the earlier Committee plan, save the elimination of the novice class license. Furthermore, several elements of the scheme are so preposterous, illegal, or patently unwise, that they undermine the credibility of the scheme as a whole. The Board's scheme undermines the purposes of this service set forth in Section 97.1 and renders enforcement more difficult and uncertain. In short, the scheme constitutes a "dumbing down" of this service that is contrary to the considered opinion and best wisdom of the amateur community.

For reasons stated in the *Comment of Kenneth S. Cannaday* ("my original Comments") filed herein on December 15, 1998, the FCC should not impose any scheme that reduces licensing standards, whether they relate to Morse Code telegraphy or other elements of operational and technological literary. Rather, the FCC should use the procedure described in my Reply Comments to solicit a new proposal from the amateur community that does incorporate its considered opinion and best wisdom. Alternatively, the FCC should file a new Notice of Proposed Rule Making incorporating the League earlier plan (the Committee Plan) and solicit comments thereon. Alternatively, the FCC should continue with the current license structure after making minor adjustments such as the adjustments suggested in my original Comments.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20544

In the Matter of	)	
	)	
1998 Biennial Regulatory Review --	)	
Amendment of Part 97 of the Commission's	)	WT Docket No. 98-142
Amateur Service Rules.	)	

To: The Commission

KENNETH S. CANNADAY'S
REPLY COMMENTS TO COMMENTS OF THE AMERICAN RADIO RELAY LEAGUE, INCORPORATED

Kenneth S. Cannaday ("I" or "me"), pursuant to the Rules of the Federal Communications Communications ("FCC") as set forth in Part 1 of 47 Code of Federal Regulation, hereby respectfully submits his ("my") Reply Comments in reply to the *Comments of the American Radio Relay League, Incorporated* (the "ARRL Comments"), dated December 1, 1998. I am a licensed amateur radio operator. A resume of my amateur radio, professional, and other activities is attached as Exhibit 1 to the *Comment of Kenneth S. Cannaday to Notice of Proposed Rule Making* ("my original Comment"). I filed my original Comment herein on December 1, 1998.

Summary

In Paragraph 7 of the ARRL Comments, the American Radio Relay League (the "ARRL" or "League") claims a credibility for its license restructuring plan that such plan does not deserve. Paragraph 7 alleges that: "[the League's] Board of Directors is the most widely representative body of Amateur Radio operators in the country." Paragraph 7 further alleges that the League conducted a two and one half year study of the amateur

licensing structure and received input from League members and non-members. However, as I will demonstrated, the League's Board totally abandoned the plan that the League formulated as a result of its study and opinion survey; a plan that was well received by the amateur community. In place of such plan, and in derogation of the League's study and its opinion survey, the Board substituted a radically different, highly controversial[1] plan. The Board unilaterally formulated the League's current plan hastily, during a chaotic one-day meeting. That meeting was characterized by lack of any consensus going in, numerous votes, and "lots of unpleasant comments." The League's current plan represents a substantial "dumbing down"[2] of licensing standards as compared to both the current structure and the plan that was formulated by the panel of experts who conducted the League's study and surveyed opinion on the League's behalf. Furthermore, the League's current plan is in derogation of member and non member input and opinion, particularly the opinions of amateurs whose input should be given the greatest weight.[3] In short, the League's Comments are not the considered opinion and collective wisdom of the amateur community. Finally, the League's plan contains a number of elements that are patently unwise, unpopular, or even preposterous.

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[1] The League alleged in Paragraph 7 that "any license restructuring proposal for this service is highly controversial." After the League published its current proposal, it heard "from thousands of members and non-members. . . ." However, the record demonstrates quite clearly that it is the *current* plan that is controversial. The plan that the specially-constituted committee of experts formulated on the League's behalf -- the same committee that conducted the study and received the amateur input that the League relies upon to establish its credibility -- drew hardly a peep from members or non members.

[2] "Dumb down" is a term that I have borrowed from League Director John Kanode, as used in Exhibit A attached hereto: "Some view this [proposal] as dumbing down."

[3] At least two factors should be considered in determining how much weight to give the opinion of an particular amateur: (1) the extent to which the amateur's opinion may be infected by self-interest, particularly his interest in an easy upgrade as a result of lower standards; (2) the extent and intensity of the amateur's knowledge and experience. All that is known about respondents in the League's opinion survey is their license class and age.

Reply Comments

1. In 1996, the League's Board of Directors authorized the WRC-99 Planning Committee (the "Committee") and charged it with the responsibility of investigating the issues involved in license structure simplification. The Committee solicited opinion from the amateur community and otherwise complete its study, and it made recommendations to the Board in the form of a proposed license restructuring plan.

2. In February 1997, the League published a summary of the opinion survey of members and non members commissioned by the Committee. A copy of the summary is attached to the League's Comments as Exhibit A. The survey demonstrated overwhelming support for Morse Code testing,[4] particularly among extra class amateurs (75% of members and 82% of non members) and young amateur radio operators aged 24 and under (85%).[5] Among amateurs holding general class licenses and above, support among League members was overwhelming, ranging from 70 to 75 per cent. Among such licensees who were not members, the results were similar: 82% among extras; 61% among the advanced class; and 67% among generals. Finally, the published summary showed that nearly 60% of extra class amateurs support the current 20 wpm requirement for full amateur privileges (amateur extra class). Only 8 % favored a level of 5 wpm. Although not

[4] The survey was phrased in terms Morse testing without any specific proficiency level being specified. Arguably, a majority of those who support Morse testing might be satisfied with universal testing at 5 wpm. However, 5 wpm is largely regarded among amateurs as a "joke." Most general class and above amateurs do not consider 5 wpm "proficiency" to constitute proficiency at all. Rather, 5 wpm is regarded as a level that technically complies with international regulations, and nothing more. For example, the Royal Society of Great Britain, which opposes Morse testing at any level whatever, has petitioned for universal 5 wpm testing in the UK. Obviously, the RSGB regards 5 wpm testing the moral equivalent of no testing whatever; which it is.

[5] The overwhelming support of CW by the youngest amateurs is significant for the reason than many CW skeptics argue that CW is not "the future of ham radio." Exhibit B. Apparently, the amateurs who *are* the future of amateur radio do not agree.

reported in the February 1997 summary, survey respondents reported a high level of Morse Code Continuous Wave ("CW") activity.[6] For example, 78% of extra class respondent reported using CW regularly or occasionally. That was the same as the percentage who reported using SSB regularly or occasionally.[7]

3. In the March 1997 issue of *QST*, the League published the recommendations of the Committee. These recommendations took the form of a comprehensive plan for license structure simplification. The League sought comments from the amateur community. Apparently, very few amateurs commented.[8] As the League has acknowledged on numerous occasions, license restructuring is a highly emotional and divisive issue among amateurs. The fact that the Committee proposal generated so few responses means one thing: it was well received. By contrast, the League's current proposal has generated outrage, particular among leading amateurs.[9] As a result, the League is currently engaged in a campaign to reconcile with these members and to convince them that the League had no meaningful alternative.[10] The League has attempted to convince disgruntled members that

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[6] In the past, amateurs have demonstrated that they will abandon a technology that becomes obsolete. Early in this Century, amateurs abandoned spark in favor of CW in the space of a single year. In the early 1960, amateurs abandoned AM in favor of SSB over the space of a few years. The continuing popularity of CW among amateur HF operators is the best evidence of it continuing importance and effectiveness as compared to alternative HF technologies.

[7] This result was published in the April 1998 *QST* editorial. A more interesting statistic would have limited the inquiry to only those operators who use HF. Many extra class amateurs limited their activities to VHF/UHF operations. Therefore, some unknown percentage of the 22 % of extras who reported that they do not use CW do not operate on HF at all.

[8] Roanoke Division Director, John Kanode, N4MM, has stated that he received less than 15 comments over a two year period even though he repeatedly solicited comments in a Roanoke Division bulletin periodically sent to every member in the states of North and South Carolina, Virginia, and West Virginia. "[T]he feedback from members was small and inconclusive." Exhibit A.

[9] In Paragraph 7 of its Comments, the League states that it received "thousands" of comments between July and October, 1998, in response to the publication of its current plan.

[10] See the e-mail of ARRL Director John Kanode, attached hereto as Exhibit A. See also the letter from League President Rod Stafford, which was posted on the League's web site, copy attached hereto as Exhibit B. Finally, see Exhibit C, a table published in *QST* which attempts to convince members that the League plan has "something in it for everyone."

it had to propose a plan drastically reducing Morse proficiency standards in order to head off an even worse disaster.

4. During the two years that it was studying the issue of amateur license restructuring, the League repeatedly led its members to believe that it did not intend to offer or support any restructuring plan that reduced or "dumbed down" licensing standards, particularly in regard to Morse Code proficiency. See for example, the three Exhibits attached to the ARRL Comments.[11] As late as April 1998, Executive Vice President David Sumner published an editorial in *QST* praising the merits of CW[12] and promising that the League would supported the *status quo.*[13]

5. "Until February [1998], the [ARRL] [B]oard [of Directors] saw no need to rush into [a restructuring proposal], however since February, the whole picture changed. The FCC let it be known that they would be issuing their 1998 Biennial Review some time this summer . . . They let it be known that it would deal with [license restructuring]. It was found out that they were going to propose a four class system with one level of Morse

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[11] In addition to these formal publications, League officials repeatedly voiced opposition to "dumbing down" licensing standards informally. For example, Roanoke Division Director John Kanode personally told me at the September 1997 Shelby, NC hamfest that the only consensus that had developed as a result of his solicitation of comments was: "don't dumb it down any further." John is the Director who formally moved the Board's adoption of its current plan at the Board's July, 1998 meeting.

[12] David pointed out that many areas of amateur experimentation require the use of CW, often because no other mode approaches the weak signal capability of CW. It should be noted that these areas of investigation are the areas where amateurs are capable of advancing the radio art. See Section 97.1(b). That is, these are areas that do not attract interest from multi-national corporations and their billion dollar R & D budgets. David also pointed out that CW facilitates technical self training, since amateurs can design and construct CW-only transceivers, but they cannot design and construct multi-mode or SSB transceivers. Finally, David pointed out that CW remains extraordinarily popular and that operator skill has never been greater.

[13] A copy of the editorial is attached to my original Comment as Exhibit 23. David has since advised me personally that *status quo* referred only to international radio regulations. That is one possible reading of his editorial. On the other hand, any member who read the editorial in full would certainly have felt reassured that the League had no intention of proposing or supporting a reduction in Morse Code proficiency standards.

testing (5WPM)."[14] As set forth in the margin,[15] the record suggests that the Board panicked, acted with extraordinary haste, and fashioned a plan out of whole cloth in the heat of a single day. In that turmoil, the earlier proposal of the WTC 97 Committee was either completely over looked or, more likely, rejected *in toto*. The League has never given a formal explanation for its total abandonment of the Committee Proposal. An informal explanation is described below.

6. ARRL Director John Kanode is the Director who formally introduced the League's current plan before the full Board. According to John, the League has proposed to reduce Morse Code proficiency standards so drastically, not because such reduction was best for the amateur service,[16] but because the FCC was getting ready to propose an even "worse" plan.[17] The Board believed that any proposal to retain the *status quo* would "not be accepted by the FCC." Exhibit A. Apparently, the Board concluded that the

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[14] ARRL Director John Kanode, e-mail, Exhibit A.

[15] "An FCC proposal to simplify the licensing structure, as a part of a biennial review of all FCC regulations governing all services, is imminent. The Board did not want an FCC proposal to be the only basis for discussion of the structure." *QST*, September 1998, Page 48. In fact, the Board's proposal was fashioned at a single Saturday meeting that began with no consensus, even on the number of classes of licenses to propose, and only "near consensus" on whether to propose any license simplification at all. See the description of this process from the "It Seems to Us. . ." column of the September 1998 issue of *QST*, which is attached here to as Exhibit D. That such a drastically radical downgrading of licensing standards should be proposed in such haste, without first being reviewed and commented upon by the amateur community, is unwise, to say the least. This is especially so, in my view, because there is no issue that effects the quality of the amateur service more than licensing standards.

[16] John has never formally acknowledged that the League's current proposal is "bad," or that it is not in the interest of the amateur service. On the contrary, he has argued (at least for the record) that "Some view [reduced Morse standards] as dumbing down. I do not agree. . . . I will never support the elimination of the Morse requirement but on the other hand, in today's telecommunications environment, three levels of Morse Testing has long been overtaken by event." See Exhibit A. John has never specified what those "events" are. Regarding only HF, the last event I know of that in any way threatened the continuing utility and popularity of CW took place in the early 1960's; namely, the rise of SSB as a practical mode for amateur radio.

[17] "[T]hey were going to propose a four class system with one level of Morse testing (5WPM)." Exhibit A.

League's proposal was the most they could salvage in terms of preserving reasonable testing standards. I believe that the League underestimated the FCC.

7. There is a rumor that the FCC wants to impose a single level of Morse testing at 5 wpm in order relieve itself of the political burden caused by the physician certification procedure for handicapped individuals. If true, this is a legitimate concern for the FCC, even if it has an element of "wag the dog."[18] In my opinion, the League should have attempted to find a solution to the political and administrative stress caused by the certification procedure that preserved a reasonable level of Morse proficiency testing. In my original Comments, I proposed a complete solution to the problem of handicap certification.[19] My proposal does not require any reduction in Morse testing standards.[20]

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[18] I use the term "wag the dog" as an idiom for allowing a less important administrative or cosmetic consideration to control the disposition of a more important substantive issue. I recognize, however, that there are times when an administrative consideration is more important than a substantive outcome. Political stress to the FCC caused by the handicap issue is an important consideration. It should not result in a 5 wpm standard for general class privileges. However, it is of sufficient import to justify other substantive adjustments such as the two that I proposed in my original Comment.

[19] I proposed replacing the physician certification procedure with the self-certification procedure that I described in detail. I also recommended abolishing the exclusive extra class phone sub-bands while preserving the extra class CW sub-bands. This eliminates handicap certification for extra class testing.

[20] As set forth in my original Comment. Morse Code CW serves virtually all of the purposes of the Amateur Service. First, it is the amateurs mode of last resort (important in emergencies) for the reason that it is the most effective weak signal mode. and because it is technologically simple allowing operators to put a signal on the air when no other mode is possible. Second, it is an essential experimenter's tool, particular in areas of experimentation where there is little or no commercial wireless interest and where ham are therefore likely to make a difference. Third. it is an incentive for technical self training: few hams can design or build SSB or multimode transceivers, but most hams can, and many do, build their own CW only transceivers, either home-brew or kits. Fourth, CW enhances international goodwill because it enables contacts that otherwise would not occur, either because CW is the only mode that can get through under the existing conditions or because the foreign amateur does not conduct intercontinental communications in any mode other than CW. Foreign hams may limit their intercontinental operations to CW for three reasons: they are not sufficiently confident of their English conversational skills to engage in international radiotelephony; they are not financially affluent enough to buy commercial gear and must homebrew CW-only gear; and personal preference. Furthermore, "radio rage" so prevalent in the phone bands, rarely occurs in the CW sub bands for one important reason: bandwidth. A CW signal requires less that one fourth the spectrum required by SSB. Thus, while it is often impossible to find a clear frequency to conduct communications in the 75 and 20 meter phone bands, it is almost always possible to find room in any CW band (except during certain contests).

8. In formulating the League's proposal, some Directors (and its President, see Exhibit B) may have been guided, in part, by the League's institutional self interest. Recently, the amateur population has not only stopped growing; there has been an actual decline.[21] The League must be gravely concerned. Any sustained decline in the amateur population is bound to cause a reduction in League revenues. Declining revenues could mean layoffs and curtailment of some important activities. While these matters concern me greatly as a League member and supporter, "dumbing down" licensing standards (in the hope of attracting more individuals to the amateur service and more amateurs to League membership) is not a legitimate response.

9. The League's plan contains elements of "dumbing down" that range from the preposterous to the unwise. These include the following:

a. The proposal to grant *no code* technicians the privilege of transmitting Morse Code CW signals, up to 200 watts, on any HF CW frequency (save only the extra class sub-bands). Such proposal is not only preposterous; it is patently illegal.[22]

b. The proposal to automatically upgrade novices and technicians plus to general class. This proposal is preposterous. Such proposal ignores the two fundamental purposes of the licensing requirements. The primary purpose is that amateur radio communications requires a technologically literate licensee. Neither technicians plus[23] nor (especially) novices meet the minimum standard of technological literacy that has been re-

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[21] See the ARRL President's letter in Exhibit B. Stafford makes reference to this decline in the context of defending the provisions of the League's proposals that "dumb down" CW testing standards.

[22] The League implicitly acknowledges the illegality of this proposal in footnote 17 of its Comments. Executive Vice President David Sumner has admitted that "reasonable minds" could so conclude. January 1999 *QST* p. 9.

[23] Technicians who earned their licenses prior to 1987, when element 3 was divided into 3a and 3b, are an exception.

quired of general class HF operators for at least the last half century. That minimum is a passing understanding of the technical and operational principles covered in examination elements 3a and 3b. The secondary purpose of amateur licensing is the incentive it provides for technical and operational self training. Nothing undercuts "incentive licensing" more than an automatic upgrade, since the upgraded amateur has no incentive whatever to study the examination elements that he is not required to pass.

c. The proposal to allow CW operators with novice level, and below novice level, skill to transmit CW signals outside of some reasonably limited sub-band. The proposal is grossly unwise. Coupled with the proposal noted in the preceding paragraph, it has alarmed many operators. In the January 1999 issue of *QST*, the League acknowledged that it had received numerous protests "painting nightmarish scenarios of CW bands filled with thousands of incompetent operators attempting to communicated in a code they do not understand." The League has obviously exaggerated and mischaracterized these comments for purposes of discrediting them. However, I believe that operators are justified in being alarmed. Many amateurs have observed that our bands are already overpopulated with operators whose skills do not meet minimally acceptable levels.[24] CW operators whose skills do not measure up often fail even to hear important weak signal communications.[25] I have frequently heard Stateside operators call CQ right on top of some weak

[24] A letter in the Correspondence column of the September 1998 *QST* is typical of these complaints: "On any given day, the HF bands are full of inept operators."

[25] In his April 1998 Editorial appearing in *QST*, ARRL Executive Vice President David Sumner, K1ZZ, observed: "Tuning quickly across an HF CW band with your receiver set to [a 2.5 KHz] bandwidth, you will miss the fact that there are scads of weak [CW signals]." David's entire editorial is attached to my original Comment as Exhibit 23. It makes a strong case for CW -- a much stronger case than the League made in its Comments.

international signal.[26] Such operators are frequently unable to understand a request to "QSY" (change frequency) and they repeat their CQ over and over, destroying the international communication that Section 97.1(e) seeks to encourage. Under the League's proposal, interference of such nature will occur more frequently. Furthermore, the additional interference (and the international bad will that it will cause) will be permanent. The League's proposal is not an experiment. The League has made it clear that it will never make a proposal to restricted or confined in any way the current privileges of any class of operators, even if "nightmarish scenarios" do materialize.

14. In its Notice of Proposed Rule Making (the "Notice"), the FCC stated that the original reason for Morse Code proficiency testing was to insure that amateurs could recognize important communications of other services and stay clear of them. Today, similar considerations apply. No amateur should have general CW privileges unless he is capable of recognizing the important communications activities of other amateurs so that he can refrain from causing interference. Such important communications include international messages, favored by Section 97-1(e); traffic nets, favored by Section 97-1(a); and emergency traffic, favored by Section 97-1(a); as well as routine CW communications. Operators with novice level, and below novice level, CW skills should have their CW activities confined to some reasonably limited sub-bands, so that they do not cause interference to others operating outside such sub-bands. That is the reason that novice sub-bands were

[26] This happens most often when the foreign operator is working "split"-- that is, he is listening for Stateside stations on a frequency other than his own transmit frequency.

originally created. These sub-bands do not necessarily have to be the current novice sub-bands.[27]

Conclusion

15. The League's current proposal does NOT contain the considered opinion and collective wisdom of leading operators[28] in the amateur community. It would establish standards of operational competency far below what is considered appropriate by the vast majority of active amateur HF operators, particularly those operators who have distinguished themselves by achieving the highest levels of knowledge and skill. These are the very members of the amateur community whose opinions should be given the most weight.

16. The FCC should not impose a new license structure without first receiving a proposed plan that DOES contain the considered opinion and collective wisdom of leading operators in amateur community.

17. To that end, the FCC should solicit resumes from the amateur community and appoint a board of leading amateurs to investigate the issues, survey opinion, and propose a plan to simplify the amateur license structure. I have set forth further recommendations concerning this option in the margin.[29]

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[27] I generally agree with the League's proposal to expand the phone sub-bands, recognizing that the result will be smaller CW sub-bands. CW and Phone are approximately equal in popularity on HF, but CW require a much smaller bandwidth Phone. Therefore, most of the overcrowding that occurs on the amateur HF bands occurs in the Phone sub-bands. Operators who have novice level skill might be denied the bottom 50 KHz of each CW band, for example (rather than just the bottom 25 KHz on four bands reserved for amateur extra operators).

[28] "Leading operators" is intended to include those amateurs with the highest levels of experience, the highest levels of knowledge, and the highest levels of achievement in the amateur arts.

[29] The board should be constituted of a high percentage of amateurs who have no self-serving reason for favoring a reduction in licensing standards. Such a board might, for example, consist of 28 active extra class, and 2 active general class, amateurs. Advanced class amateurs have a strong incentive to see the 20 wpm standard abolished. Such incentive undermines the credibility of their opinions and proposals. Any such incentive on the part of general class operators is far more removed. Operators with less than general class privileges, by definition, are not experienced HF operators, even if they have engaged in some HF operations within their limited privileges. Additional suggestions include the following: a. The board

18. Alternatively, the FCC should issue a new Notice of Proposed Rule Making containing the February 1997 recommendations of the ARRL WRC-99 Committee set forth in Exhibit A of the ARRL Comments, and solicit comments on the same. The Committee Recommendations should be amended as set forth in the margin before being adopted by the FCC.[30]

19. Alternatively, the FCC should retain the current license structure, making only minor adjustments thereto, such as the ones I recommended in my original Comment.

20. In no event should the FCC reduce testing standards, including Morse Code proficiency standards. The FCC should not impose the League plan reducing the standard for general class licensing to 5 wpm and eliminating the 20 wpm standard for amateur extra class. The FCC should not impose a single, universal standard of 5 wpm.

Respectfully submitted this 13 day of January, 1999

Kenneth S. Cannaday, W4NZC

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should attempt to formulate the ideal licensing plan for the Amateur Service without regard to transition issues, such as the League's guiding principle that no current licensee have his privileges reduced. Such considerations "wag the dog." Once a plan is formulated, the issues of transition can then be taken up. b. The board should consider alternatives for eliminating or reducing the administrative and political burdens imposed upon the FCC by issues relating to handicap certification. c. Members should serve without compensation or reimbursement of expenses. d. No League director or officer should serve, but the board should seek input from League officers and directors who have studied license restructuring. League members should be encouraged to serve. e. The FCC should request interested amateurs to submit resumes of their amateur, professional, and other activities. Logs of amateur operations might also be requested to determine if applicants have indeed been active. The FCC should selected board members on the basis of their qualifications.

[30]The new "Intermediate class" CW privileges should be confined to some reasonably limited sub-bands, though not necessarily the current novice sub-bands. A self-certification procedure for handicapped individuals, as discussed in my original Comments, should be instituted to replace the current physician's certification procedure. The current extra class phone sub-bands should be eliminated so that advanced class amateurs would have all amateur HF privileges except for the four current extra class CW sub-bands.

Certificate of Service

I hereby certified that I placed a copy of this document in an appropriate wrapper; addressed it to counsel of record for the American Radio Relay League, Incorporated at the address shown on it Comments: affixed proper first class postage; and deposited it in a receptacle under the exclusive control of the United States Postal Service.

This the 13 day of January, 1999.

Subject: ARRL Licensing Restructuring Proposal
Date: Fri, 7 Aug 1998 21:58:52 -0400
From: "Dennis Bodson" <bodsond@worldnet.att.net>
To: <tool4man@earthlink.net>, <KCannaday@worldnet.att.net>, <kf4wlb(
<mattmj@ioa.com>, <cloth@interpath.com>
CC: <n4m@arrl.org>

EXHIBIT A

From: John Kanode

Subject: ARRL Proposal for AR licensing restructuring.

Date: Monday, July 27, 1998 1:46PM

It appears that there is a lot of misconception in regards to the ARRL licensing restructuring proposal and why it is being proposed now. Over the past several years, the FCC has received many requests from the Amateur Radio population in general to simplify and restructure the Amateur Radio licensing system. Many feel that the present system has outlived its usefulness, has been overtaken by events and in today's high tech world is too heavily biased on CW proficiency. Also many feel that the written part of the examinations is out of date and needs to be examined. Many feel that if Amateur Radio is going to be around for the long term, the present license system needs to be revisited.

The ARRL Board and staff have been studying this issue for sometime and a survey was conducted over a year ago. No action was taken because the feedback from members was small and inconclusive. I devoted significant space on restructuring and asked for input in my 1996, 1997 and 1998Roanoke Division Newsletter, which I send out to all ARRL members in the Roanoke Division each year. I got back less than 15 replies for the last two years and only 4 until after the board meeting. Until February, the board saw no need to rush into this, however since February, the whole picture changed. The FCC let it be known that they would be issuing their 1998 Biennial Review some time this summer and it would have significant items of interest to the Amateur Radio community. They let it be known that it would deal with how many Amateur Radio license classes should there be and how many levels of Morse testing are necessary. It was found out that they were going to propose a four class system with one level of Morse testing (5WPM). A FCC official at the FCC forum at the Dayton Hamvention reaffirmed that this was about happen.

It has become obvious for sometime that the license structure is going to be changed and the ARRL directors are aware of that. Not one at the meeting supported the status quo. The board had two options, sit on it's hands and let the FCC call the shots or offer a proposal that would be more acceptable to the Amateur Radio community. If we sat on our hands and let the FCC do as they please, we would be criticized for not taking a leadership position and letting the Amateur Radio community down. You are damned if you do and damned if you don't.

It was not an easy decision for the board. The whole board knew that supporting the status quo was not going to be in the best interest of Amateur Radio's future and more than likely not be accepted by the FCC. After many hours of discussion, it boiled down to 2 strawman proposals.
One was the four class system with two levels of Morse testing and the other was a three class system. Many directors thought the 4 class system was too conservative and wanted a 3 class system. Unfortunately, the board minutes do not reflect this. After several votes, and a lot of unpleasant comments, the board voted for the four level system with two levels of Morse testing. The board agreed on two basic tenets, no one should have privileges removed or be forced to upgrade or lose their license and that where reductions in the Morse speed requirements were made, there will be a INCREASE in written examinations standards. More questions, questions changed to reflect today's operating conditions and technical requirements. Some view this as dumbing down. I do not agree. If done right, it will bring the Amateur Radio Service licensing more into the world of today, not the 1950's. I will never support the elimination of the Morse requirement but on the other hand, in today's telecommunications environment, three levels of Morse Testing has long been overtaken by events.

Where are we now? On Tuesday, July 21, a letter with the ARRL proposal in it was hand delivered to the five FCC Commissioners. What will happen from here is anyone's guess. The FCC could incorporate our proposal in place of theirs or it could very well ignore it and proceed with their 4 class, one Morse level proposal. It is also possible they may take parts of both and create a new, 3rd option. Once the Biennial Review is issued, everyone will have an opportunity to comment on it. I hope the Amateur Radio community as a whole, as you have made the effort to comment to me, will take the time and effort to comment on the upcoming Biennial Review (NPRM).

For those who seemed to be more concerned with how I voted than the issues at hand, I was one of the 9 that supported the four license system with two levels of Morse testing. If you wanted a 3 license system with one level of Morse testing, in all good faith, I could not support that proposal.

I know this is a long message and if anyone would like more details, please give me a phone call. The number is on page 10 of each QST.

More info and FAQ can be found on the ARRL Web Page, www.arrl.org.

73, John, N4MM

Amateur Service Restructuring Proposals

ARRLWeb News Page · *ARRLWeb* Home Page

The ARRL and the FCC both have proposals "on the table" for restructuring and simplifying the licensing structure of the Amateur Radio Service. This page provides background information to explain why some changes must occur -- and why the time for these changes is now -- links to the specific proposals and links to news items about the restructuring process.

Links

EXHIBIT B

Restructuring FAQ

Proposals

ARRL Proposes Simplified Amateur License Structure

FCC Notice of Proposed Rulemaking, WT Docket 98-143
· Errata

ARRL's Comments to the FCC on WT Docket 98-143 (Adobe PDF file, 128,617 bytes)
· Appendix to Comments (PDF, 30,879 bytes)
· Exhibit A (February 1997 *QST, Results of the WRC-99 Opinion Survey*) (PDF, 196,233 bytes)
· Exhibit B (March 1997 *QST, Member Comments Sought on Licensing Structure*) (PDF, 25,237 bytes)
· Exhibit C (September 1998 *QST, License Restructuring for the Future*) (PDF, 109,177 bytes)
· Exhibit D (December 1998 *QST, ARRL Board Reaffirms, Fine-Tunes Its Restructuring Proposal*) (PDF, 23,102 bytes)

More background informatio
***The ARRL Letter* and W1AW**
ARRL Board reaffirms, modifie
(30-Oct-1998)
ARLB057: FCC proposes to streamline amateur rules
(11-Aug-1998)
Structuring the restructuring debate
(31-Jul-1998)
ARRL Board proposes simplified license structure
(24-Jul-1998)
Hams await FCC's restructuring plan
(24-Jul-1998)

Background

A Letter from ARRL's President

A number of members have asked why the ARRL Board of Directors, at its July 1998 meeting, decided to propose changes to the amateur radio licensing structure. Let me see if I can shed some light on some of the reasons for the proposed changes.

I am certain that some hams will find change itself to be very disconcerting. It is our nature to like things the way they are and the way they were. We're generally comfortable with that and not comfortable with change. In many instances, we would like to return to "the good old days" of ham radio. However, there are some very real reasons why amateur radio has to make some changes if it is to be around in the 21st

century.

As amateur radio operators, we're slipping farther and farther behind on the technology power curve, and people take note of that. Take a look at the primary modes of communication we use: SSB, FM, CW, etc. Each of those modes of operation have been around 50, 60, 70 years or more. I was traveling by airplane not long ago and the person sitting next to me was a retired electrical engineer. As we chatted I told him about my involvement with amateur radio. He had a ham license about 45 years ago. He was amazed hams still use SSB, let alone CW. He wondered why the hams didn't use some of the more "modern" modes of communications. This is a typical reaction. We have to change people's perception of ham radio being a pursuit involving 70 year old communication techniques. One of the ways to help change that perception is to modernize our approach to CW. We're not eliminating it, we're simply trying to put in its proper perspective as we move into a new century. CW will be around for a very long time as one of the modes of communication for amateurs. There are still many people who use CW to communicate. However, as an examination element, it carries much more weight than it should at the present time. I believe the League proposal will put CW into a more proper perspective in the examination context as we try to bring amateur radio into the current technological environment.

I don't think there are many people who see CW as the future of amateur radio. If they do, in my opinion, they are looking backwards and not to the future of ham radio. And, as I mentioned, we're not eliminating CW. There will be plenty of people operating CW just as they have for years. Most non-hams think of ham radio as a hobby. And as a matter of fact, most hams think of amateur radio as a hobby. Sure, the League tries to stress the emergency communications and the public service aspects of amateur radio to those that are unaware of that role and people outside of ham radio do have some understanding of that role of amateur radio. It is certainly one of the first things I tell people about amateur radio if they have no acquaintance with the amateur service. However, the bottom line is we're viewed as a hobby.

The point is, we have some very valuable spectrum that is available to us for hobby purposes, and yes, even for our public service activities. It has become more and more difficult in recent years to justify retaining and defending our spectrum from commercial interests who make some very good arguments as to why they should be allowed to use our spectrum for endeavors that will generate jobs, used advanced telecommunications techniques and put the spectrum to use for commercial purposes, not just for hobby purposes.

Even considering the perception that what we do is a "hobby," we can counter some of that perception that we're "a dying breed" clinging to old technologies when we can show that amateur radio is a vital, growing activity. One only has to look at the statistics in the last few years to find that to be untrue. In recent years the average age of an active ham has crept up to nearly 60 years old. The growth rate of new hams coming into the service is at a very low rate of less than 2%. That doesn't even keep up with the "loss rate" of people who die or simply leave amateur radio for various reasons. The argument that we need to retain spectrum for the growth of amateur radio in the face of such dwindling numbers is an unconvincing one to anyone, such as the FCC and commercial interests, who take a moment to look at the numbers.

Taking these factors into consideration, the perception of ham radio is one of an aging group of hobbyists who use "less than state-of-the-art" communication techniques. We may not like that perception but that is what it is in many circles of the communications industry. And of course the communications industry is where we have to compete for our spectrum. The changes proposed by the League are not the total solution to the problem. We still have to make an effort to move into more advanced communication techniques in the near future. We need to take advantage of some of the more cutting edge modes of

digital communication to allow for more efficient use of the spectrum. The Board of Directors is aware that merely restructuring license classes and modernizing the CW testing requirements is not the whole answer.

The League is going to have to take the lead in promoting technological advances within amateur radio even if it is just stressing the idea that amateurs put to use in amateur radio some of the techniques used by the commercial services. Hopefully, we'll be able to rise to that challenge. And it's not just the League that needs a different mindset to get us into the next century with a vital amateur radio. For example, we might persuade repeater coordinators to give priority to sanctioning repeaters that are going to be using advanced digital modes rather than the 50 year old narrow band FM mode.

We might even persuade radio manufacturers to market HF radios that use other modes than CW and SSB as the primary modes of communication below 30 MHz. There are digital techniques that can be applied to the amateur service that would make more efficient use of the spectrum and minimize the interference potential between stations.

I suppose the bottom line is we in amateur radio have to start thinking about the future and where we want amateur radio to be in the future. Changes within ham radio have been suggested for quite a number of years. The pressure for change has been building. The FCC has had a continuing stream of proposals from individual amateurs to make significant changes over the last ten years or so. The League, for various reasons, has resisted such change, myself included. However, I think the proposal the League recently adopted will move us as amateurs in the direction we need to be going.

I have resisted engaging in any debate about the pros and cons of CW and how it is or is not a filter for "quality" amateurs getting on the HF bands. There are plenty of people who will spend hours and hours debating that subject. I don't. Not only that, it misses the whole point of why the Board suggested the changes it did. If you have an urge to do that, I can suggest some internet newsgroups where that debate has been raging for years and with no satisfactory conclusion I might add.

Any comments you have regarding the specific provisions of the proposal can be addressed by filing comments with the FCC now that the matter is released for public comment.

I also have to make a comment about the "motives" of the members of the Board in making such a proposal. Some hams who are not in favor of the changes have said the Board made the move to make sure more radios were sold. Some have said it was to attract more members to the League. I can state without any hesitation that the Board acted in the best interests of amateur radio and for no other reason. Most all of the members of the Board have been amateurs for 35 years or so and some even much longer. These are not people who want to see amateur radio be hurt in any way. They don't spend 30 or 40 hours a week working on amateur radio matters for anything other than the benefit of amateur radio.

I don't think there is anyone on the Board who cares how many radios Yaesu, Icom or Kenwood sell. Those companies are involved in other commercial activities and the amateur radio segment of their business is not large in the context of their entire commercial enterprise. If one or more of those companies should leave the amateur radio market, some other company will fill the void and market amateur radios. Of course, that assumes there is an amateur radio service.

The League would obviously like to have more of the amateurs as members. I certainly don't dispute that. But that doesn't mean it will benefit any person on the Board if the League has additional members because we are volunteers to begin with. We don't get paid and we certainly don't get any bonuses if

additional members join the organization. It actually means the League can provide more in the way of services to the members more than anything else.

I would hope that you would consider these factors in assessing the need for and the effect of the League's proposal. There's no reason the changes are being suggested other than they are needed. Other changes along the lines that I mentioned are also needed for the amateur service to continue to be a growing, valuable service.

73,
Rod Stafford, W6ROD
President, ARRL

"It Seems to Us..."

[from September, 1998 *QST*]

Restructuring

Nothing else in the history of Amateur Radio matches the controversy that has surrounded changes in the structure of license classes, requirements, and privileges. Emotional debate preceded the introduction of the Novice, Technician, and Extra Class licenses in 1951, and the elimination of any differences between the privileges of General, Advanced, and Extra licensees that took effect in 1953. The pattern was repeated in the mid '60s with the resumption of so-called incentive licensing, which would have gone much more smoothly had it not been applied retroactively. The FCC eliminated the code test for the Technician license in 1991 in the face of considerable opposition. So, it should surprise no one that new proposals for changes in the FCC amateur licensing structure are also proving to be controversial.

Ideas ranging from minor tweaking of the licensing structure to fundamental changes in its philosophy are forever circulating in the amateur community. In January 1996, the ARRL Board noted that various concepts for simplification of the amateur licensing structure were being discussed and created a committee to solicit membership opinion on the issue. In December 1996, the committee reported to the Board the results of a survey of members and non-member amateurs. The survey results were summarized in February 1997 *QST*. The committee also offered recommendations for changes in the licensing structure at the entry level, reflecting the fact that, like it or not, the Novice license is no longer the path of choice into Amateur Radio. The Board received the report at its January 1997 meeting and ordered that the committee's conclusions and recommendations be published in *QST*, but took no position on them. At the July 1997 and January 1998 meetings of the Board, neither the committee's recommendations nor any variation thereon attracted majority support of the Directors. Members continued to comment, and Directors continued to ponder the matter.

In February, the need for action became a bit more urgent when the FCC released a list of 31 "regulatory review proceedings" that it intended to initiate this year. The FCC is mandated by the Communications Act to review some of its regulations every two years, beginning in 1998. Late in 1997, FCC Chairman William Kennard had decided that the first biennial review should be the occasion for a top-to-bottom review of the Commission's rules, with the objective of deregulating and streamlining wherever possible. One of the 31 proceedings was described as: "Streamline Amateur Radio Service. Seek comment on amending Parts 0, 1, and 97 of FCC Rules to privatize further the administration of the Amateur Radio Service and to simplify the licensing process." At first it seemed that the Commission's proceeding would focus on an overdue cleanup of numerous pending petitions for rulemaking, including several from the

ARRL. However, as time went on we began to hear that it would include a proposal to streamline the amateur licensing structure itself. Having an FCC proposal on the table as the only restructuring proposal offered for discussion did not seem to be desirable; the ideas of the amateur community itself needed to be on the table at the very outset of such a proceeding. Even so, as the Board members gathered in Connecticut for the July 16-18 meeting and with release of the FCC proposals reportedly imminent, there was no assurance that there would be majority Board support for any particular alternative.

The Board already had committed some time to a strategic planning review in conjunction with its July meeting, so the meeting schedule was even more crowded than usual. The Board meeting went into recess on Friday night with virtually all of the formal business completed, except consideration of restructuring. An informal session on Saturday morning revealed that while there was near-consensus in favor of structural simplification, opinion was much more divided as to whether there should be three or four classes of license. Following an afternoon devoted to strategic planning, Board members reassembled after dinner to continue their discussions. What ultimately emerged as the majority position is described at Minute 53 of the meeting minutes and in more detail in Rick Palm's article beginning on page 48 of September *QST*. The proposal has been submitted to the FCC in the form of a letter to Commissioners. Additional information can be found below and in the Restructuring FAQ.

Two principles guided the Board: No present licensee should lose privileges, and present licensing standards should be maintained. The ARRL proposal calls for combining the present six classes of license into four, similar to the present Technician, General, Advanced, and Extra; refarming of the Novice bands to put those valuable portions of the HF spectrum to more effective use; and maintenance of present licensing standards by coupling a reduced emphasis on higher Morse code speeds with improvements in the written examinations. Full access to the HF bands would require Morse proficiency at 12 words per minute, similar to most other countries, but meaningful HF access would be available at 5 wpm.

Some members, we know, do not like the Board's decision on restructuring. Some oppose any change; others oppose change that doesn't go as far as they might like. Many say they like the basic idea, including some who have suggested minor changes. Whatever your own opinion may be, bear in mind that we're a long way from a final resolution of the matter. The next step should be the release of an FCC Notice of Proposed Rule Making on the subject, with a window for public comment. As soon as there is further news, we will share it with you. -- *David Sumner, K1ZZ*

ARRL's Proposal · FCC's Proposal

ARRLWeb Home Page

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EXHIBIT C

Table 2

Everyone Gains Under the ARRL Proposal

License Class	*Benefit*
Technician	Would gain CW privileges (200 W) in the following segments: 3.525-3.700, 7.025-7.125, 10.100-10.150, 14.025-14.150, 18.068-18.110, 21.025-21.150, 24.890-24.930 and 28.000-28.300 MHz.
Novice	Would gain *all* current General class privileges, including the proposed expanded phone bands.
Technician Plus	Would gain *all* current General class privileges, including the proposed expanded phone bands.
General	Would gain 3800-3850 kHz; 7200-7225 kHz; 21250-21300 kHz in expanded phone bands.
Advanced	Would gain 3725-3775 kHz; 7125-7150 kHz; 21175-21225 kHz in expanded phone bands.
Extra	Would gain 3700-3750 kHz; 7125-7150 kHz; 21150-21200 kHz in expanded phone bands.

people; experimentation should be supported and encouraged; and rules that result in the underutilization of parts of some bands should be removed.

In July, the Board by a vote of 9 to 6 had agreed on a plan calling for four classes of amateur license. Because only 3% of new amateurs begin as Novices these days, the desirability of maintaining this traditional portal into Amateur Radio was outweighed by the fact that the present structure forces the 90% who enter as Technicians to pass a Novice written exam element that is largely irrelevant to the privileges they are seeking as Technicians. Therefore, the Board proposed to eliminate the Novice license. The first of the four surviving license classes would correspond to the present Technician, but with a more relevant written exam.

The second would approximately correspond to the present General, but with a 5 word per minute (WPM) Morse code exam in place of the present 13 WPM and an expanded written exam. With the lower code speed for General, the Technician Plus would no longer be needed. Presently licensed Novice and Technician Plus amateurs would be assimilated into this license class.

The third would correspond to the present Advanced, but with the Morse requirement changed from 13 to 12 WPM — admittedly a minor change, justified primarily by the fact that 12 WPM is the most common standard for a full-privilege amateur license in other countries.

The fourth would correspond to the present Amateur Extra, but with a more rigorous technical exam replacing the 20 WPM code test.

Under the ARRL plan, several HF phone bands could be expanded because there would no longer be a need for the so-called Novice bands. The details of the July plan are shown in September 1998 *QST*, p 48.

Fine Tuning the July Plan

On October 24, as they discussed the specifics of the Board's July plan and the FCC's NPRM, Board members found themselves in agreement that the bulk of the July plan was on target with the exception of two points. First, the redesignation of the license classes as D, C, B, and A had little support among the membership, so the Board decided to return to the names people seem comfortable with: Technician, General, Advanced, and Extra. Second, there was concern that eliminating the Novice license would make it more difficult for young people to get involved in Amateur Radio and would increase the sense of isolation between HF-oriented and VHF-oriented amateurs. To address the latter concern, the Board decided to propose limited HF privileges for Technician licensees: the use of CW emission only in the General Class band segments where phone is not permitted, with a transmitter power not exceeding 200 W.

Regarded as a rather radical concept when first introduced, the idea of HF CW privileges for "codeless" Technicians grew on Board members. CW operating privileges are self-limiting: You can't make use of them if you don't know how, and if you do know how, a test is redundant. International regulations simply require that a person seeking a license to operate below 30 MHz "shall prove that he is able to send correctly by hand and to receive correctly by ear, texts in Morse code signals." The FCC has already decided that the ability to receive Morse code implies the ability to send it. No minimum speed is specified in the international regulations. Finally, as every CW operator knows, the best way to become proficient in Morse code and to

proposed that the FCC rules ban multiple-choice Morse code tests and establish that a passing grade for a code test be either 70% correct answers to 10 fill-in-the-blank questions or one minute of solid copy out of five. The Board affirmed its proposals in RM 9196 to improve the procedures for granting Morse code exam credit on the basis of a physician's certification of a disability. The Board also supported retention of the topic definitions to be included in written exams as contained in §97.503(c) of the FCC rules with some modification to accommodate the new four-class structure. Under the proposed testing regime, the Technician exam would include 35 questions. Applicants for General would have to pass a 35-question test, up from the current 30 questions to include additional questions on operating practices. The Advanced exam would go from 50 questions to 40 under the proposal while the Extra exam would go from 40 to 50 questions, including more highly technical subject matter. The proposed matrix of examination elements with the number of questions on each topic is shown in the minutes of the meeting on page 51.

The Board also reaffirmed its desire that Advanced class volunteer examiners be permitted to administer General class exams, and it renewed its request in RM-91[illegible] for several rules changes involving RACES stations.

Focus on the Future

Perhaps the most important outcome of the October 24 meeting was that the resolution encompassing these positions was adopted unanimously. While the individual features of the plan were not necessarily embraced by every director, the complete package was one that everyone felt they could support.

One question raised in the NPRM was not addressed at the meeting: how the FCC can improve its enforcement processes as they relate to Amateur Radio. The Board's Enforcement Task Force is studying this issue separately and will offer recommendations for Board consideration in mid-November. Once there is agreement on how to handle this important issue, the League will file comments reflecting the Board's positions.

The Board members appreciate not only the quantity, but especially the quality of members' comments on the complex and difficult issues relating to license restructuring. By and large, members' focus is precisely where it should be: on the future.

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the radio amateur in legislative matters, and for the maintenance of fraternalism and a high standard of conduct.

ARRL is an incorporated association without capital stock chartered under the laws of the State of Connecticut, and is an exempt organization under Section 501(c)(3) of the Internal Revenue Code of 1986. Its affairs are governed by a Board of Directors, whose voting members are elected every two years by the general membership. The officers are elected or appointed by the directors. The League is noncommercial, and no one who could gain financially from the shaping of its affairs is eligible for membership on its Board.

"Of, by, and for the radio amateur," the ARRL numbers within its ranks the vast majority of active amateurs in the nation and has a proud history of achievement as the standard-bearer in amateur affairs.

A *bona fide* interest in Amateur Radio is the only essential qualification of membership; an Amateur Radio license is not a prerequisite, although full voting membership is granted only to licensed amateurs in the US.

Membership inquiries and general correspondence should be addressed to the administrative headquarters; see page 10 for detailed contact information.

Founding President (1914-1936)
Hiram Percy Maxim, W1AW

Officers

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Office Manager: Robert Boucher

*Executive Committee Member

"It Seems to Us..."

Restructuring

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