

January 14, 1999

Federal Communications Commission
Office of the Secretary
Room TW-A325
The Portals
445 12th Street, SW
Washington, DC 20024-2101

RE: WT Docket No. 98-143 -- informal comments in reply to the Comments of the
American Radio Relay League, Incorporated

To: The Commission:

My background. I am an active amateur radio operator holding an amateur extra class license. My high frequency amateur radio activities include both single side band (SSB) and Morse Code continuous wave (CW). I divide my time roughly as follows: 75 % SSB; 25 % CW. Professionally, I hold a Ph D in sociology from the University of North Carolina at Chapel Hill. I taught sociology at Wake Forest University, conducted research at the Economic Unit of the US Department of Agriculture, and operated a business (Dilworth Box Office and Services) that I started in 1986 and sold in 1994. Since 1994, I continued to worked in Dilworth Box Office until 1996 and then took an extended sabbatical to travel around the world. I returned to my home in 1998. I have done some consulting work and otherwise worked part time since then. I am 46 years old.

Introduction: The purpose of this letter is to respond informally to the Comments of the American Radio Relay League, Incorporated. I oppose the ARRL's proposal to reduce the Morse Code proficiency requirement for the general class license from 13 to 5 words per minute. I also oppose the League's proposal to reduce the proficiency requirement for amateur extra from 20 to 12 wpm.

My comments: To me, the Morse Code proficiency requirement is a matter on basic operational literacy. There are times when one *must* use CW if she is to get through at all. It might be because her equipment is simple and capable of CW emissions only. It might be because her signal is too weak to be understood on any other mode. (Maybe she is using an improvised antenna from her campsite in the Blue Ridge Mountains, for example. Or, if she is at home, maybe her antenna has been damaged by high winds. She can receive okay, but she can't put out much of a signal.) Under current licensing standards, an operator can be sure that she can communicate with any amateur operator who receives her signal (even an operator whose CW skills are rusty), whether the other station is on CW or phone. That can be a handy thing, particularly in an emergency. It will no longer be the case when the phone bands fill up with 5 wpm generals. When those operators get rusty, they won't be able to decode CW signals at all.

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There are many examples, real and fictional, in amateur literature that illustrate how an operator whose only alternative is CW may need to call a station who is conducting a contact on phone. In *The Complete DX'er* (Idiom Press, 1989, page 174), Bob Locher, W9KNI describes how he called TN8BP (for a new country) on CW. TN8BP was concluding a contact on SSB. Mr. Locher had to use CW because State side stations did not have phone privileges on TN8BP's frequency. Locher had to reduce his CW speed to 10 wpm because TN8BP's skills were rusty; but he made the contact. In the juvenile adventure novel, *SOS at Midnight* (originally published in the 1950's and republished in the 1980's by the ARRL), Walker Tompkins, K6ATX (now deceased) describes how a young amateur used the oscillator in a grid dip meter to call SOS on CW. The operator knew the time and operating frequency of an amateur radiotelephone net, but he had no receiver. At the appropriate time he tuned the grid dip meter to the net's frequency and called. A net member was not far away and copied the operator's SOS and location. In the League's *Operating Manual* (1995-96), Ray Soifer, W2RS, describes how he used his hand-held VHF FM transceiver and 4 inch "rubber duck" antenna to improvise a CW signal. He made a contact through the RS-10 Russian amateur satellite. He used his mike button as a Morse key and his station receiver for the down link. (See page 13-4.) Such technique has interesting implications for amateur emergency communications from remote locations.

The current 20 wpm standard for amateur extra class proficiency is not necessary for basic operational literacy; but it is consistent with the policy of "incentive licensing." It provides an incentive for operational self training. With the high speed code one hears on the amateur CW bands these days, 20 wpm is really a minimum for any serious CW operator. Advanced class operators who are not interested in operating CW need not upgrade at all; they give up very little in additional phone privileges by foregoing the extra class Morse examination. The theory examination for upgrading from advanced to extra class is not very difficult, compared to the advanced class exam, and contains little in the way of useful technical self training, in my opinion. Should the Commission be so inclined, I would have no objection to increasing advanced class privileges to include the current extra class phone bands.

Conclusion

I sincerely hope that the Commission will not impose the low standards of Morse Code proficiency testing that the ARRL has proposed. In the March, 1997 issue of *QST*, the League published a much better plan that it had prepared after taking a survey of member opinion. I had some reservations about that plan because it reduced the proficiency level for the general class license to 10 wpm, and it continued the recent trend of increasing high frequency privileges for amateurs who pass only a 5 wpm test. Nevertheless, I would not be writing to the Commission if the ARRL had proposed that plan instead of its current plan. The ARRL's current plan seemed to come out of "left field" with no warning. I oppose the reduction in standards that the League has proposed because I believe that such reduction, or other similar reduction in standards, would be very harmful to the amateur radio service.

I very much appreciate this opportunity to make my views known.

Sincerely yours,

A handwritten signature in cursive script that reads "Shelley L. Pendleton".

Shelley L. Pendleton, AE4HD

PO Box 31547

Charlotte, NC 28231-1547