

Before the
Federal Communications Commission
2025 M Street NW RM 8010
Washington, DC 20554-0001

MASTER

In the matter of WT Docket No. 98-143

1998 Biennial Regulatory Review
Amendment of Part 97 of the Commission's
Amateur Services Rules

Notice of Proposed Rule Making (NPRM)
Reply Comments: Due Jan. 15, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

From:

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Gordon Girton
1-12-99

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From: Sunnyvale VEC ARC, Inc.
Date: Jan. 12, 1999
Subject: Reply Comments, for NPRM 98-143

Our comments follow:

1. Classes

Ref. #1-6

Novice	Remove
Technician Plus	Remove
Technician-No-code	Remove element 2.
General	Keep but lower the code speed.
Advanced	Keep but lower the code speed.
Extra	Keep but lower the code speed & remove element 4B.

2. Elements required.

Ref. #1-6

Elements 2 & 4B	Remove
Technician-Nocode	Remove element 2 & keep element 3A.
General	5 WPM, 3A, 3B, lower code speed.
Advanced	5 WPM, 3A, 3B & 4A, lower code speed.
Extra	15 WPM, 3A, 3B & 4A, lower code speed.

Element 3A will be required for the Novice upgrade to General.

3. Suggested Code speeds and requirements

Ref. #1-6

General Class	5 WPM.
Advanced Class	5 WPM.
Extra Class	15 WPM.

Lowering the code speed for the General & Advanced class, should help the Code waiver problem.

Change Part 97.503 (a) to read:

A telegraph examination must be sufficient to prove that the examinee has the ability to receive correctly texts in the international Morse code at not less than the Prescribed speed, using all the letters of the alphabet, Numbers 0-9, period, comma and question mark.

Add:

Passing grade 70% or one minute solid copy.

Remove: (In-Part)

Send correctly by hand.

Receive by ear.

Prosigns AR, BT and SK.

3a. Suggested Code speeds and requirements

Ref. #1-6

Code Exam:

Ten Multi-choice Exam questions & 70% to pass.

Multi-choice is favorable over the fill-in-the blank Exams, it removes the VE's judgement in the process of Grading. Multi-choice removes the questionable letters, such as I-L-T.

It's rather hard to generate a 5 WPM code exam which includes:

1. All the letters of the alphabet;
2. All the numbers;
3. Period, Comma, question mark;
4. All the prosigns, AR, BT and SK.

Please remove the Prosigns from Part 97.503(a).

UPGRADING-Element(s) required.

4. Novice count= 76,246

Ref. #7

5. **Novice Class to General.**

3A & 3B.

6. Technician Plus count= 147,281

Ref. #7

7. **Technician Plus to General.**

97.505 (3)

Licensed before 2-14-91, give credit for 1A, 2 & 3A.

97.505 (8)

Licensed before 3-31-87, give credit for Element 3B.

Attend a VEC session, no other Exam required.

8. Technician-No-code count= 186,627

Ref. #7

9. **Technician No-Code to General.**

5 WPM and 3A.

10. Question Pool and number of questions.

Ref. #1-6

Remove Element 2.
Element 3A, 30 Questions.
Element 3B, 30 Questions.
Element 4A 40 Questions.
Remove Element 4B.

No changes to the question pool until the VEC
Question Pool Committee (QPC) changes that element(s).

A major change in the question pool could:

1. Delay the new FCC rules changes?
2. Cause a 6 month delay for the new study manual(s)?

11. Advanced Class VE's

Ref. #1-6

VE testing teams in Alaska, have problems finding 3 VE's
to create a Amateur Exam session.
That's why the General Class Amateur's were allowed to become
VE's when the Novice program was transferred to the VEC program.

The VEC program needs more Volunteer Examiners.

Allow the General Class to give Exams for element 3A.
Allow the Advanced Class to give Exams for 5 WPM, 3A & 3B.

Ref:

1. Sunnyvale VEC ARC, Inc.
2. Gordon West Radio School
3. Federal Commissions Commission
4. Raymond Adams, WCARS VEC
5. Fred Maia W5YI VEC & NCVEC
6. ARRL
7. Number of Amateur's, FCC hand-out at the 1998 VEC Conference dated 7/6/98.

Respectfully submitted



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Jan. 12, 1999