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January 27, 1999

Via Hand Delivery

Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Attention: Public Safety and Private
Wireless Division, Wireless
Telecommunications Bureau

Re: WT Docket No. 98-143; Notice of Oral
Ex Parte Presentation; Biennial Review,
Amateur Radio Part 97 Regulations.

Dear Madame Secretary:

This letter, being filed in duplicate, constitutes a memorandum of an oral ex parte presentation made to the Chief, Public Safety and Private Wireless Division, Wireless Telecommunications Bureau, on January 21, 1999, by Mr. Bob Brunkow, the President of Icom America, Inc. (ICOM). The letter is filed pursuant to the Section 1.1208(b)(2) disclosure requirements in permit-but-disclose proceedings.

The presentation was made by Mr. Brunkow, who was accompanied by the undersigned. The presentation summarized the position of ICOM on the restructuring of Amateur Radio Service licensing, and addressed the issues raised in the Notice of Proposed Rule Making in the Docket proceeding. ICOM filed reply comments in this proceeding, but not all of the points made by Mr. Brunkow were addressed in those reply comments.

Mr. Brunkow noted the need for additional growth in the Amateur Service, and especially the fact that there is at present a severe shortage of RF engineers (as opposed to digital engineers). In the past, new RF engineers and technical professionals have been drawn from the ranks of radio amateurs. There is a need to continue and bolster this trend.

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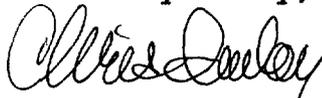
To do so, Mr. Brunkow noted that the emphasis on Morse telegraphy should be reduced, and barriers to entry to the Amateur Service should be removed. The Amateur Service is a "great equalizer" for disabled persons, and disabilities are invisible among radio amateurs. Disabled persons should be encouraged to become licensed, and the examinations should measure levels of accomplishment, and should not act to keep anyone out. From the perspective of an equipment manufacturer, it is in the interest of the Amateur Service to encourage sustained growth, which will result in reduction in the retail cost of amateur equipment.

Mr. Brunkow also noted parallels between amateur radio licensing and private pilot licensing. In both fields of endeavor, there is a "fear of failure" which keeps many from attempting to become licensed.

Most importantly, Mr. Brunkow suggested the urgent need to resolve this proceeding expeditiously. The pendency of this proceeding has itself stifled growth in the Amateur Service, because it has caused those who might otherwise enter or upgrade to wait for the outcome of the license restructuring decisions.

Any questions concerning this presentation should be addressed to the undersigned.

Yours very truly,



Christopher D. Imlay