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I find my sentiments in favor of the petition for reconsideration on FCC 99-412 as set forth by Wormser, Adsit, & Dinelli, based on the following points in their petition: =20

EMPHASIS ON TECHNICAL QUESTIONS:

The Report and Order decreases the emphasis on the technical questions on the written tests, and thus fails to maintain the Amateur Radio Service as a fundamentally technical service.

APPLICANTS REPEATING FAILED TESTS:

The Report and Order fails to address comments regarding the practice of applicants repeating failed test elements at one sitting by just paying a second fee to the Volunteer Examiner. This practice degrades our ability to test an applicant's knowledge and is a burden for Volunteer Examiners.=20

AMATEUR EXTRA CLASS TELEGRAPHY EXAM:

The Report and Order unnecessarily reduces the speed of the Amateur Extra Class telegraphy examination as a way to avoid code waivers. The new 5 wpm telegraphy speed for the General Class is adequate as a reasonable accommodation, thus making code waivers unnecessary.

TECHNICIAN: DATABASE RECORDS AND ENFORCEMENT:

The Report and Order removes the designation =93Plus=94 from the Technician Plus license as it appears in the FCC database. Unlike licensees of the Technician Plus Class, the =93no code=94 Technicians do not meet the international treaty requirements for operations below 30 MHz. Merging the two classes hampers the FCC's ability to enforce the treaty.

Additionally, I believe that the FCC is overreacting to the changes in maritime law which drops the maritime CW service and requirements for=20 onboard CW capability. CW Morse has always been, still is, and will=20 remain the simplest, most reliable, efficient, and cost effective means of ship-to-ship, ship-to-shore, and land based radio communication. Any ships captain who does not retain CW capability is being both foolish and naive. The same argument applies not only to maritime services but as well to all branches of the armed services. Consequently, for the=20 sake of common societal good, it is incumbent upon the amateur service to continue to maintain a pool of skilled CW operators and the FCC to support that mission. Let us not be penny wise and pound foolish.

Respectfully submitted,

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