

Dear FCC...

I agree with the points raised in the Wormser, Adsit, & Dinelli Petition for Reconsideration in this matter. Morse Code is still a usable and viable mode of communication for those who are proficient in its' use. As mentioned in their PETITION there are times in emergency situations where Morse Code is the only usable and effective means of radio communication.

If a five word-per-minute level is to be the criteria I recommend that the requirement to pass the Morse test be for 100% perfect copy for one minute (or 25 characters consecutively copied without error). This is not an excessively difficult requirement but would require a certain amount of effort and learning on the part of the applicant. There should also be a Morse Code sending test with the same criteria for passing. The multiple-choice question format to determine whether or not the applicant has correctly copied the test message should be eliminated as it is only an indication in many cases that the applicant has copied enough letters and characters to make an educated guess.

In addition I would like to recommend that the actual questions along with the correct answers to the actual examination questions not be published or made available to applicants. Since using narrative answers and drawings instead of multiple choice format would probably be unworkable under today's volunteer examining system I would suggest that the Commission's question pools be expanded to a minimum of 1000 questions per element and the choice of answers be thusly expanded to 5-10 possibilities for each question.

I would also like to see an additional class of licensing or endorsement to an existing license be established that would apply to those interested in tube-type vintage radio communications equipment. I feel that this endorsement should focus on two areas - a: safety issues, because the inherent electrical voltages and current levels can be dangerous and lethal if not dealt with in a knowledgeable and safe manner. and, b: there should be some demonstrated knowledge of the suppression of radio frequency interference to other Services as much of this equipment may not be adequately shielded and may cause interference if certain conditions are not met.

I understand the Commission's intentions with respect to 98-143 and generally agree with the provisions therein in order to ensure that the Amateur Service is perpetuated. However I do not agree that the standards should be lowered to a point where someone with inadequate knowledge could pose a threat to themselves by improper knowledge of safety procedures and also impact the Service and radio frequency spectrum with interference and improper operation of the equipment.

Sincerely,

Michael Crestohl,
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