We support in every regard the Petition for Partial Reconsideration filed by Wormser, Adsit, & Dinelli.

In our opinion, throughout this entire process, far too little attention has been paid to the mission of the amateur radio service as set forth in Section 97.1 of the FCC rules. It has been said that an operator need not understand electronics and other technical subjects to properly operate commercially manufactured radio. The statement is not accurate. A significant level of technical literacy is desirable for anyone operating a the typical amateur station consisting of a single sideband transceivers driving a full legal limit power (vacuum tube) amplifier. Without the required level of technical expertise, the operator will likely cause interference to his neighbors and to other stations, endanger himself and others, and possibly destroy his equipment. Even if the statement were correct, it would miss the point. Major elements of the mission of the amateur service -- to maintain a reservoir of trained technicians and electronics experts; to further the radio arts through experimentation -- cannot be fulfilled by technically illiterate operators. Finally, the FCC can expect to become more and more involved as the arbiter of disputes between amateurs and their neighbors if a new bred of amateur is licensed without having the technical expertise to resolve interference problems on their own.

It has been said that operators who are Morse code illiterate can contribute to the advancement of the radio arts. That statement is accurate, but not complete. Technical self-training is part of the amateur's mission under section 97.1. Morse code literacy is an important force in encouraging technical self training. For example, there is a popular amateur radio activity (referred to as "QRP") in which participants design and build their own low power transceivers as a means of technical self training. Among the most active amateurs, regardless of their primary area of amateur interest, most will eventually built at least one transceiver, whether "homebrew" or kit. However, these transceivers are invariably for Morse code only, not for radiotelephony and not for some new digital mode. Morse illiterate amateurs cannot be expected to design or build such radios. Continuous waver Morse code radiotelegraphy is also an important experimenter's tool for advancing the radio art. It is the mode of choice for weak signal experimental communication such as moon bounce, low frequency, and HSCW meteor scatter, and other areas of weak signal experimentation. Emergency public service communication frequently requires skill in Morse code telegraphy, as was documented in the Petition for Reconsideration. Therefore, assuring a reservoir of Morse code literate amateurs through the incentive of the 20 wpm standard for the extra class license is necessary if the amateur radio service is to accomplish its mission of conducting effective emergency communications, encouraging technical self-training through the design and construction of homebrew or kit transceivers, and experimentation in the area of weak signal communications.

For these reasons, in addition to all the reasons set forth in the petition, we support the petition for reconsideration of Wormser, Adsit, and Dinelli.

Respectfully submitted

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