Ref: Comments on the Wormser, Adsit and Dinelli Petition for Reconsideration of certain provsions of R&O 99-412, the recent R&0 which is intended to restructure the Amateur Radio Service.
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(1). The underlying fear among legions of Amateurs is that the extant R&O is quite frankly in the direction of further "dumbing down" of the Amateur Radio Service. To the point where the current drift in regulatory thinking indicates that at some point it might very well be difficult to discern any working differnce between the requirements for entry into the Amateur Radio Service and entry into the Citizens Radio Service. Which would obviously not be in line with the basic justifications for the existence of the Amateur Service.
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The subject R&O is clearly at odds with itself with respect to the Commisssion's stated objective of "fostering technology within amateur radio" on one hand and then on the other hand mandating via 99-412 significantly reduced testing of the technical skills of applicants for amateur operator's licenses and/or license upgrades. Therefore I fully support WA&D recommendations #1 and #2 which would essentially retain and/or reinforce a meaningful technical testing process and would be much more in line with the Commmision's stated intent per 99-412.
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I have no comment on WA&D recommendation #3 which deals with testing/retesting/timing issues.
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I very strongly support the basic thrust of the WA&D recommendation #4 which requests reconsideration of the code test speeds for the Amateur Extra Class license. My contention being a that a mix of preservation of an art in combination with maintaining bottom-line communicatons capabilities when all else fails needs to be fostered by the FCC. A Five words per minute code speed is not sufficient for entry use on the HF amateur bands because the speeds normally used are significantly higher. The 5wpm user therefore would not have sufficient skill to use the mode on a normal basis and thus be prepared for use of the mode under emergency conditions. The WA&D Petition requests retention of the existing 20 wpm test but as a practical matter I believe that operator proficiency in the 12-15wpm range would be sufficient for actual use under normal and emergency conditions.
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I have no comment on WA&D recommendation #5 which deals with the chaos involving the coded vs. no-coded Technician class licensees.
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Respectfully,
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C. Brian Kelly, w3rv