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January 25, 2000

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Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WT Docket 98-143
Report & Order FCC 99-412
*Wormser, Adsit &
Dinelli petition*

Dear Ms. Salas:

I am writing to express my support of the *Wormser, Adsit & Dinelli Petition* filed with the FCC on January 17, 2000.

It is indeed unfortunate whenever standards are lowered for any reason. We have an education system in this country that is producing kids who cannot read. As an amateur radio operator of some 35 years I have watched the level of understanding and enthusiasm diminish among new entrants into amateur radio each time the FCC has relaxed the testing requirements. I believe this restructuring of the amateur license will be counterproductive, yielding poor operators who lack knowledge, resourcefulness available in emergency conditions, attitude and drive. The word on the streets these days seems to be "make it easy for me so I will not have to work too hard." The result is always...*always* that the goal (in this case, an amateur radio license and the privileges it imparts) becomes of little value.

Hundreds of thousands of amateur radio operators have spent untold hours over the years preparing for successfully-achieved amateur radio licenses. Sadly, the FCC's "lowering of the bar" trivializes the achievements of thousands of severely handicapped licensees who have overcome their disabilities to pass 13 and 20 word per minute code tests and comprehensive examinations..

The ARRL, NCVEC (W5YI) and equipment manufacturers have painted an erroneous picture of the situation. *In each case they have a financial gain to be made.* As a result, I fear, such groups' agenda is NOT for the continuance of a strong amateur radio service but instead for making it available to as many people, *at any price*, in order to keep money rolling in. These groups pay a lot of lip service to the marvels of satellites and computers and I certainly am not denegrating the place *alongside other technologies* that these inventions have. But let's not delude ourselves into thinking that, should all of the "gee whiz" stuff

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be rendered unusable by some unforeseen communications infrastructure collapse, that we want *fewer* options! Amateur radio operators have long been this country's last defense in such a case. Their assertions to the Commission that Morse code is not used any more in emergencies is a lie. Personally I continued to use it during recent emergencies and, yes, it does make it through when all other modes fail. So why are we wanting to make the holder of an amateur radio license less of a communicator? To use the metaphor that we need to reduce the code speed to attract more people is like saying we should lower the requirements for airline pilots to attract more people into aviation. Does having larger numbers of less qualified people in any field serve anyone?

If indeed compromise is necessary, the *Wormser, Adsit & Dinelli* petition proposes a reasonable one. As their petition points out, those who seemed to influence this FCC decision the most are, themselves, largely responsible for the deterioration in skill level. Their assumption that Technician Class licensees are incapable of equipment repair and depend on manufactured radios is unfortunately correct.. And this is good? What technological advantage does the NCVEC, ARRL and Kenwood expect will come from a "plug and play" license? As the petition points out, it would seem that the majority of 2200 commenters were snubbed. Meanwhile, marketing brochures from these groups show amateur radio as little more than families using walkie-talkies and repeaters to talk to each other. If this is the case, then what is the FCC's Family Radio Service (FRS)?

The FCC relied too heavily in its R&O on the NCVEC which sees dependence on ready-made equipment as a positive thing. The original intent of the Technician class license was experimentation and invention in the VHF/UHF spectrum. But largely due to the efforts of the NCVEC and their ilk, it has deteriorated into a citizens band license contributing little other than an FM version of CB. Further, the FCC should rely on anything from the NCVEC with caution, especially in terms of question pools or other administrative suggestions, given the cases of testing fraud that have been reported.

The R&O damages the integrity of the amateur radio license by allowing unrestricted retesting. As the petition points out, applicants could conceivably eventually pass all elements, one at a time, under the R&O/NCVEC plan. Such a testing procedure is unacceptable in any legitimate and respected testing arena.

As the *Wormser, Adsit & Dinelli* petition points out, the 20 word per minute code requirement is yielding the fastest growing numbers of all amateur radio licenses. It would appear there is no barrier but, instead, individuals lacking initiative. The NCVEC and Kenwood comments demeaned the usefulness of Morse code. Yet, the R&O seemed to ignore very good comments about use of the Morse code in emergencies. Morse code is not only a good filtering mechanism that teaches discipline and reason but knowledge of same has saved the day in many situations both in and out of amateur radio operations. My wife, who is not an amateur radio operator but has been able to "pick up" Morse code just by being around it, was left behind in the car while I went into a post office to mail a letter. While inside, amid the cacophony of other honking horns and street noise I picked out one horn that sounded as if it was sending "S O S." I initially thought it curious, then I realized that it was indeed a distress signal. I ran to the door of the post office to see a man attempting to break into my car evidently to get to my wife. My appearance chased him off but this true story is a matter of police record. My point being, we as licensed amateur radio operators should retain our abilities and high standards as we may be called upon to use them in unpredictable and even dire situations. Amateur radio operators should be resourceful communicators.

Allowing an individual to claim an exemption to take a code test by taking an oath is asking for fraud. One need only observe the unauthorized use of handicapped parking spots at a mall to understand how this proposal would be abused given today's climate when it comes to honesty and integrity.

For so many years, industry and business has benefitted from the rich pool of human resources created by amateur radio operators. This pool was resourceful ***not because the government went to them and offered a hand out***, but because it drew in people who possessed initiative and saw challenges as opportunities. Requiring licensees to stretch themselves to reach achievements has manifested itself in all manner of inventive endeavor. As a result, look at the myriad of technological breakthroughs we enjoy today at the hands of those who over the years learned code and improved proficiency. ***They*** were not content to memorize to pass multiple choice tests, but instead, studied with the goal of ***understanding*** the theory on which they were to be tested.

I respectfully request the Commission adopt the *Wormser, Adsit & Dinelli* petition for partial reconsideration.



Vern A. Weiss