

Before the
Federal Communications Commission
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Comments of Jay Kolinsky

Please do not further water down the Quality and recognition of Amateur Radio by eliminating Morse requirements for those that can't learn it or are not willing to try!

My name is Jay Kolinsky. As a teenager in 1958 I passed a 5 wpm Morse test and a simple written test covering basic electronics and regulations. After 8 weeks I received my Novice class Amateur Radio license. I joined the ranks of approximately 160,000 U.S. Amateurs. I quickly set up my Morse station. I made many contacts. I had to upgrade rapidly as the Novice license was good for only 12 months. Back in '58 if you failed a test given by the FCC you had to wait 30 days before retesting. After 3 more months of reading electronics books and actual on the air use of Morse, I passed the 13 WPM General test. I was very happy to attain all Amateur privileges.

In the late sixties it seems Directors of the ARRL decided that Amateurs were not as knowledgeable about electronics as they could be. They proposed that FCC restructure Amateur licensing. Incentive Licensing was created. I lost some of my privileges. To get them all back I had to learn more electronics and pass a 20 wpm code test issued at an FCC field office which I did.

Time past and the FCC decided they did not have the funds available to them to continue testing people for Amateur licenses. The ARRL and other groups snapped up the opportunity to become coordinating bodies for testing. The Volunteer Examiner program was born. Now one could take tests from a small group of other Amateurs. Soon the 30 day waiting period for those that failed a test disappeared. One can test at 6:00pm and if not successful, retest at 7:00pm and again at 8:00pm, and so on.

Over time we starting hearing rumblings in the ham community that we were not getting enough new people into Amateur Radio. It seems there is a fear that if we don't have enough 'Hams' in America the allocated frequencies may be taken away for commercial use. The Directors of the ARRL decided they may have made it a little too difficult to get an Amateur license. Possibly the Morse requirement was the big stumbling block they thought. In their wisdom they again proposed another restructuring of the FCC licenses. A new class was born. The no code technician. Renewable for life. Testing for the 1 year Novice license faded into history. Yes the door was wide open for those that did not wish to put the effort into learning Morse.

Years passed and the same rumblings were being heard. Again the Directors at ARRL came up with yet another restructuring proposal to FCC. Lets reduce the Morse requirements to 12 wpm they asked. In response FCC said why not 5 wpm for ALL Amateur licenses. And it came to be.

More years went by. We are again hearing the same rumbles. "We are not getting new people into Amateur Radio. Let's get rid of Morse. It is antiquated. It's a stumbling block to good people." Has anyone of those

making these claims looked at the statistics? The total number of licensed Amateurs in the USA is around 680,000, close to a record high!

Currently my Morse proficiency is approximately 30 words per minute. I'm an FAA licensed pilot. Served in the USCG as a radioman in Search & Rescue. In 1969 invented the Electronic Sirens used in most fire & burglar alarms and emergency audible warning systems used throughout the world. Played a major role in the design and sale of the 100 square mile, emergency siren evacuation systems currently used at all the nuclear power plants in N.Y. State. Hold active U.S. patents. Serving my 3rd term as President of the Greater Norwalk Amateur Radio Club in Connecticut.

I have studied many of the comments to the various petitions to either drop Morse proficiency testing or change the present system to make it easier to obtain an Amateur license. Many are quite eloquent in stressing their opinions. Are we looking for eloquence or facts?

Most Proponents for eliminating Morse claim it is antiquated. A block to good citizens wishing to become Amateur Radio Operators and to those wanting to use High Frequency radio spectrum.

Modern Amateur Radio transceivers are very advanced. They are manufactured with state of the art microprocessors, integrated circuits and surface mount technology. A multitude of printed circuit boards are crammed with components and layered on top of each another. Manufacturers use specialized computers to manufacture and repair faulty equipment. Today, very few people can repair hi tech equipment themselves.

In addition, many Amateurs now purchase their antennas rather than build them. Most are "Plug & Play" operators. They pop their new radio out of a box, read the instruction booklet, screw on a commercial antenna and they're "on the air" in minutes. Today you certainly don't need to know much about radio to use one.

If Morse is indeed antiquated and an obstacle to acquiring an Amateur License, couldn't the current written tests be categorized in the same way? After all, if anyone, licensed or not, can buy a radio and be communicating in minutes, isn't it antiquated to be testing people about radio theory, electronics, circuits, antennas, etc, etc? Aren't these exact tests a barrier to those desirous of an Amateur Radio License? Should we now also consider elimination of written tests in order to get more Amateurs? Certainly operators should know what frequencies they are allowed to operate on and they must use appropriate language. That can be spelled out in a little card packed with every new radio or simply included in the instruction booklet.

Back in the '70s there was an uproar by certain Americans claiming only people with good High School grades were accepted by Universities. They felt this was a block to those with poor grades. What happened? We got something called "Open Enrollment". Simply show up, apply and you're in. Just pay the small fees. The result was a tremendous lowering in the quality of graduating students. World respected institutions became shadows of their former selves. Some graduates could not even read or write above 6th grade level. Indicate you were an alumni of one of these N.Y. City Colleges on your job application, and you were lucky if you could get a position flipping burgers.

Testing of any kind, in any field can certainly be portrayed as an impediment to those that want to enter that field. Shall we eliminate all forms of testing? Should we dispense with the flight test for pilots? The practical

tests for accountants, the Bar Exams for lawyers, the exams to be school teachers and professors? History has dramatically proven that when proficiency tests are diminished or removed, the result is less proficient licensees. This results in a lessening of respect for the license holder. Unfortunately, that has already occurred with U.S. Amateur Radio Licenses.

Only 2 forms of radio communications can be understood by the human ear and brain. Voice and Morse. Furthermore, only Morse is understood by both man and machine. Voice intelligibility is often compromised by poor word pronunciation, accents, voice characteristics and static. Morse, with its steady audio tone, is completely unaffected by speech oddities and has proven to be more reliable than voice under all conditions, especially during periods of severe atmospheric noise combined with extremely weak signal conditions.

Today, when all electric and phone lines are down, it is only an Amateur Radio Operator that can pass emergency traffic both locally and around the world using Morse and a simple battery powered tiny transmitter; not much larger than a sugar cube. There are no other radio services in the world that have thousands of operators that can achieve this feat! Chief Operating Officer, Ron Castleman of the Emergency Preparedness and Response Directorate (FEMA), said his agency really needs Amateur Radio's help. "Hams have a long and distinguished history of assisting and cooperating with FEMA," he said. That cooperation dates back to a 1984 *Memorandum of Understanding* between the American Radio Relay League, the Nationwide Association devoted to Amateur Radio and FEMA. He said FEMA wants to continue to work with Amateur Radio operators as partners and expand hams' community safety role.

The Department of Homeland Security has recently given monetary grants to the American Radio Relay League, to further emergency training of American Amateur Radio Operators. Most professionals in the field of Emergency Response know that when all other communications fail, Amateur Radio Operators are still communicating. "*Hams are the first of the first responders*", says Liz DiGregorio, liaison to the White House for the Citizen Corps. And this has been true since the beginning of Amateur Radio and is still true today. This fact should not be taken lightly by the FCC.

While doing away with Morse testing may bring many more people into Amateur Radio and more proliferation of the High Frequency spectrum, is that really what is best for our country? If we just want more people to become Amateur Radio operators in order to have more emergency communicators or fill up available spectrum so it appears well used, then we should eliminate all forms of testing. Complete a simple form to get an FCC call sign and license and just buy a radio. The continued erosion of the capabilities of the American Amateur Radio operator due to further relaxations of requirements will result in Amateurs having no more expertise than the average American citizen. Is this what we really want in future U.S.A. Radio Amateurs?

Yes, America has a cadre of trained radio operators that communicate during the severest communications blackouts. It is very likely Amateur Radio operators are more dependable in times of communications disruptions than any paid commercial or government systems.

There are thousands upon thousands of Amateurs that are proud of their Morse proficiency. Many use it exclusively when operating their radios. Doing away with Morse testing will eventually result in having no group nor individuals in all of America that can both understand and communicate with this basic and simplest form of communications.

The FCC regulations for Maritime Radio Operators and those that repair marine radio communications equipment require 1st Class, 2nd Class or 3rd Class Radio Telegraph Operator Certificates. If Morse is indeed antiquated, as most opposed to it claim, why does the FCC still require applicants for such Certificates to demonstrate proficiency in both sending and receiving international Morse code at minimum speeds of 16, 20 and 25 code groups per minute?

Morse antiquated? Airline and private pilots use what are called Visual Omni Ranges, ["VOR"] These are navigational aids that transmit signals in 360-degree radials providing aircraft the capability to fly point-to-point without reference to the ground. Each VOR has a name and a 3 letter identifier. It is transmitted automatically, 24 hours a day in Morse code.

There already is radio spectrum and radio services allocated by the FCC for people that wish to communicate by radio without having to test for a license. Citizen's Band, Family Radio Service, General Mobile Radio Service, Marine Radio, Aircraft Radio. Amateur Radio already has the Technician Class license for those not wishing to show Morse proficiency through a test.

Let us not fall prey to the argument that other countries have already dropped Morse testing as a requirement for an Amateur license. Obviously those countries wanted to lower the standards for their Amateurs. The FCC already allows foreign Amateurs that have not passed a Morse proficiency test, full Extra Class Amateur privileges when operating in the USA. Why should they be given an edge over U.S. Amateurs? This is the FCC's chance to set and maintain higher standards. Having the most proficient Amateur Radio Operators in the world would be a huge benefit to the country and make U.S. Amateurs even more proud of their accomplishments. And that is a good thing.

Let us bring back the worldwide respect that once existed for the American Amateur Radio License. I challenge the FCC to further recognize, through the FCC's licensing structure, those thousands of valuable assets to America. Those American Amateurs that continue to show their proficiency in High Speed Morse communications!

Please do not squander one of our country's shining assets for those not willing to learn, not willing to try, not willing to persevere. Please consider the immeasurable resource of those Americans that are still ready and eager to learn all forms of communications, including Morse. Please recognize how valuable an asset they now are and will be to our country's security and future!

Please REJECT any and all proposals to diminish or drop Morse Proficiency Testing.

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