

September 16, 2003

Concerning a Petition for Rulemaking RM-10786 filed by No Code International (NCI)

To the FCC:

I am writing to strenuously oppose the request for elimination of Element 1A as a requirement for US-licensed amateur radio operators to have operating privileges below 30 Mhz, with the following exception: I support eliminating the requirement for Element 1A in order for Technician licensees to have equivalent HF operating privileges as Technician Plus (or Technician-with-code) licensees, namely HF access to the Novice HF sub-bands with all operating restrictions (mode and power).

Many of the assertions in NCI's petition are untrue. Morse code remains a vibrant part of amateur radio and is experiencing a resurgence among military operators. Currently USSOCOM has re-emphasized Morse code proficiency for Special Forces radio operators. Knowledge of Morse code has resulted in many saved lives over the past decade, and it will continue to be useful in the future but ONLY if we have a pool of operators with basic proficiency.

Since 1990, although the total number of US amateur radio licensees has only increased by about 6,500 the vast majority (two-thirds) of the increase has been into the General-and-above HF-privileged license classes, and only one-third of new licensees have chosen to earn only Technician privileges. HF, and particularly HF QRP CW, is the fastest growing segment of amateur radio. The reduction of the code requirement to 5 wpm in April 2000 has worked in that it has encouraged MOTIVATED potential hams to earn their licenses.

NCI's response to the code requirement is to assert that more recent HF digital modes are superior to Morse in every way. Of course, this is not true as any amateur knows from experience... there are times when the fanciest HF digital mode doesn't work but Morse still gets thru. A simple example is communications between the Pacific Northwest of the US and Europe across the poles... most HF digital modes will not work with interference from auroral flutter while Morse is still copyable.

The purposes of the amateur radio service are manyfold, but include encouragement of self-study in electronics and radio operation, and unlike commercial communications systems amateurs need to use their service for training and familiarization in normal situations, and as an adjunct or alternative in emergencies. The amateur radio service is NOT meant to be a utility service that replaces current commercial communications systems including the cellular phone network, the long distance network, or the Internet. It is not unreasonable to require, and expect, amateur radio operators to be willing to put forth the time and effort to obtain and maintain a minimal level of competence in modes that may be useful to the community and the nation in emergencies; that is the price we pay for having access to portions of the radio spectrum.

NCI neglects to answer the question of "What do you use when you have a simple radio but no computer?" They point out emergencies where other modes were available, but fail to point out any situations in the past decade where ONLY Morse was available and it saved lives. Emergencies are worst-case scenarios, and while if possible we want to use the most advanced means of communications available with the equipment at hand, sometimes that means using Morse code. What will we do if NCI's petition is approved, Morse is no longer a requirement for HF privileges, and we suffer a national calamity that includes prolonged shutdown of the power grid and/or transportation network? Then, simple CW transceivers, simple wire antennas, solar-charged AA batteries, and Morse code will work when all of the fancy computers are silent with no grid power and no fuel for generators... but only if we have operators!

In summary, all of the licensing evidence available shows that 5 wpm has not been an impediment to HF licensing. On the contrary, based upon the FCC's licensing statistics, HF-privileged hams have grown by almost 40,000 (almost 20%) since the reduction of the code requirement to 5 wpm in 2000. No licensing indication shows that large numbers of potential licensees are discouraged by the relaxed code requirement. The figures DO show that the numbers of Technician licensees has decreased substantially since April 2000, and also indicate that the majority of Technician licensees will not renew their licenses once their initial ten-year period expires. In my opinion this is due to the fact that the majority who strive for the Technician license lack sufficient interest in HF operations or radio in general to be willing to commit to studying for the 20 to 30 hours that it would take to pass Elements 1A and 3. Instead, they obtain their license for utilitarian purposes and quickly find that other means of communications, such as cell phones, are more useful in everyday life. Getting rid of the Morse requirement will not substantially increase the number of amateur radio licensees, but it will result in less-trained people having access to bands where inadvertant operating mistakes can have regional, national, or world-wide implications.

We need to keep Element 1A for General-and-above licensees, grant no-code Technicians Technician-with-code privileges, and then monitor license and operating activities for a couple of years. No-code Techs can use modern technology in the form of readily-available computer programs to decode and encode Morse so they can operate on the HF bands, and as a benefit this exposure to Morse will almost certainly allow most no-code Techs to easily pass Element 1A after a year or so of casual Morse operation. Further, keeping no-code Techs in the Novice sub-bands will reduce the possibility of inadvertant interference to higher license classes who have earned their privileges while increasing operations in underutilized band segments. Taking these steps and monitoring the outcome for a few years will best give us the information we need before we go further and consider eliminating any code requirement.

Sincerely,

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