

In connection with the petitions filed under numbers RM-10781 thru RM-10787, I support the complete elimination of the Morse code requirement for amateur radio operations below 30 MHz..

I also believe that the privileges accorded to General and Extra class licensees should still be earned by passing the respective examination elements for these classes. The only exception to granting of new privileges is that Technician class operators should be given immediate access to the same limited subset of the HF bands as the grandfathered Technician Plus licensees.

I would also like to take the time to remind the commission of previous comments related to this issue and about its own definition of the amateur radio service.

In document 98-143 the commission states:

“In reaching this decision, we note that one of the fundamental purposes underlying our Part 97 rules is to accommodate the amateur radio operator's proven ability to contribute to the advancement of the radio art. We believe that an individual's ability to demonstrate increased Morse code proficiency is not necessarily indicative of that individual's ability to contribute to the advancement of the radio art. As a result, we find that such a license qualification rule is not in furtherance of the purpose of the amateur service and we do not believe that it continues to serve a regulatory purpose.”

And in the commission's own definition of the amateur service:

Part 97.1 Basis and purpose.

The rules and regulations in this Part are designed to provide an amateur radio service having a fundamental purpose as expressed in the following principles:

- (a) Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.***
- (b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.***
- (c) Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communications and technical phases of the art.***
- (d) Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.***
- (e) Continuation and extension of the amateur's unique ability to enhance international goodwill.***

In examining each of these principles, it is not easy to see exactly how Morse code fits into the defined purpose of Part 97, as listed below.

- (a) While it is generally recognized that Morse code is a valid method of communicating during an emergency, it is not the only method available to amateur radio operators.**

In fact, it could be easily argued that an increase in the number of available operators enhances the ability of the amateur community to provide noncommercial and emergency communications services to the general public.

- (b) The continuation of Morse code testing is in direct conflict with the goal of amateur radio operators contributing to the “advancement of the radio art”. It is difficult to advance the “radio art” into the 21st century, while being mired in 19th century technology.
- (c) Again, the use of Morse code is basically a late 19th century skill, requiring the understanding of Morse code, is not a rule which provides the advancement of skills in either the technical or communications phases of the art.
- (d) At one time the use of Morse code was the only method available to radio operators, at that time, the ability to send and receive Morse would have been a requirement for increasing the number of qualified radio operators. Currently, Morse is just one mode among many. By preventing entry to the upper ranks of amateur radio, the current Morse code testing requirement is in direct conflict with the goal of the expansion of a trained pool of operators, technicians and electronics experts.
- (e) While many have commented on the fact that Morse code is an international language, it is difficult to communicate anything other than a few comments using Q-signals without resorting to a common human language. The use of Morse code neither enhances nor inhibits the extension of international goodwill.

In light of the recent removal of Morse testing requirements from international treaty, the commission should act favorably to this petition, and that the required regulatory changes should be made as soon as possible.

Sincerely
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