Before the

Federal Communications Commission

Washington, DC 20554

In the Matter of	)	
	)	RM 10781
	)	RM-10782
	)	RM-10783
	)	
Changes in Part 97 with regard to	)	RM-10784
WRC-2003 Changes	)	
	)	
Telegraphy Examination Requirement	)	RM-10785
in the Amateur Radio Service	)	
	)	
Amendment of Part 97 of the Commission's	)	
Amateur Radio Service Rules to eliminate	)	RM-10786
Morse code proficiency testing requirements	)	
for all classes of amateur licenses	)	
	)	
Amendment of Part 97 of the Commission's	)	
Amateur Service Rules to eliminate	)	RM-10787
Morse code testing	)	
	)	

COMMENTS OF

CQ Communications Inc.
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Executive Summary

CQ Communications Inc.(CQ), a leading publisher in amateur radio, believes strongly that Morse code continues to be a relevant and important operating mode for amateur radio, but that there is no continued regulatory purpose in retaining the Morse proficiency exam as part of amateur radio licensing requirements. Therefore, we generally support the proposals to eliminate the code test as a licensing requirement.

We also believe that currently licensed Technicians should be given limited HF operating privileges, including data modes as well as CW and voice, as quickly as possible. We propose merging the Novice and Technician licenses, so that current Novice Class licensees are also granted full operating privileges above 30 MHz.

Because the proposed changes to testing requirements include revisions to rules concerning element credit on exams for current and former licensees, we propose simplifying the credit rules by extending credit for any current or former licensee for all elements previously passed.

We also support the proposal to permit an examination element to be taken only once at a single test session; and we support in concept the proposal that the FCC return to specifying in its Rules a syllabus of topics for each written exam element.

I. Introduction

1. CQ Communications Inc. is a leading publisher of magazines, books and videos for the amateur radio and general hobby radio markets. Our amateur radio periodicals include *CQ Amateur Radio* and *CQ VHF* magazines. *CQ Amateur Radio* is the leading independent amateur radio magazine in the United States, in continuous monthly publication since 1945. *CQ VHF* is dedicated to serving the interests of amateurs whose main operating interests lie above 50 MHz. In addition, CQ publishes *Popular Communications*, a general interest magazine for radio hobbyists, plus a full line of amateur radio-related books and videotapes. The company is headquartered in Hicksville, New York.

2. The petitions filed as a result of the decision by the International Telecommunications Union (ITU) at the 2003 World Radiocommunication Conference (WRC-03) to permit each administration to determine whether to continue requiring a demonstration of Morse code proficiency as a licensing requirement for operation below 30 MHz actually concern two distinct subjects: a) the future of the code test requirement and b) HF operating privileges for current licensees who have not passed a code test. Several of the petitions also cover other testing and element credit issues, on which we will comment as well. Since there are at least seven petitions on these topics before the Commission, we will comment on the broad subject areas rather than going petition-by-petition. To accommodate the structure of the Electronic Comment Filing System, however, we are filing a copy of these comments under each of the proceedings listed in the Public Notice (RM-10781-10787). In addition, we request that these comments also be considered in relation to the FISTS CW Club petition dated August 22, 2003, which had not been assigned an RM- number as of the date of this filing.

II. Proposals Regarding Code Proficiency Exams

3. CQ strongly believes in the ongoing relevance and value of Morse code communications to the Amateur Radio Service. There are situations in which Morse code will permit exchange of information when other modes will not, and sophisticated computer equipment is not required in order to decode messages sent in Morse code. It is one more tool in our emergency communications "arsenal" which permits amateurs to get messages through when other communications services fail. It is the preferred mode of communication for low-power operators, particularly those who take small portable radios into wilderness areas and have no other means of communication with the rest of the world. We disagree strongly with the contention by No-Code International[1] (NCI) that "technological advances *have* rendered Morse telegraphy virtually obsolete in modern communications systems..." We believe that code will continue to be used, and to thrive; that new adherents will maintain its popularity and that it is well-capable of "holding its own" as an operating mode regardless of whether the Commission continues to require a demonstration of code proficiency as a condition of earning a license with HF privileges.

4. However, the value of Morse code as an operating mode does not necessarily equate to value as a licensing requirement or provide the Commission with a continued regulatory purpose in mandating a Morse proficiency exam. The history cited by NCI[2] is essentially correct in stating that the original regulatory purposes served by the code proficiency requirement (preventing interference to commercial and government stations and distress signals, ensuring that amateurs were able to understand messages from government stations ordering them to shut down in the event of war or other emergency, and creating a pool of operators who would be proficient in code use in the event of war or other emergency) are no longer valid. The Commission itself has recognized this in its "Restructuring" Report and Order[3], stating 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." However, the continued international requirement for a code proficiency exam in order to permit operation by amateurs below 30 MHz prevented the Commission from eliminating the code requirement at that time. At WRC-03, the *Radio Regulations* were revised to permit each administration to make its own decision on continuing to require code exams for amateur HF operation. In early September, the Administrative Council of the International Amateur Radio Union (IARU), the international association of amateur radio societies, reaffirmed its position supporting "the removal of Morse code testing requirements" worldwide.[4] Many countries have already dropped their code test requirements.

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[1] RM-10786, para. 9
[2] ibid, para 2
[3] FCC 99-412, para 25
[4] Summary of IARU Administrative Council meeting of 6-8 September, 2003 (available online at <http://www.iaru.org/rel030912.html>), states, in part: "3. The Council revised an existing Resolution concerning the Morse code in the light of the WRC-03 decision to leave to each administration the question of whether or not to require a demonstration of Morse skill to operate below 30 MHz. Under the revised Resolution, IARU policy is to support the removal of Morse code testing requirements."

5. Morse telegraphy is the only operating mode for which the Commission has ever required a demonstration of proficiency as a condition of licensing, and the Commission has never required a demonstration of proficiency in any mode as a precondition for transmitting in that mode. In fact, Technicians are currently authorized to operate Morse code on the VHF bands without passing an exam, and many of them do, in pursuit of contacts via Earth-Moon-Earth, meteor scatter, or auroral propagation paths. Those who wish to use code for these activities simply learn it and use it. We believe this will happen regarding code contacts on HF as well, just as people who wish to use text-based digital modes learn to type (at varying levels of proficiency) and those who wish to use amateur television learn the basics of lighting and still or motion picture photography.

6. We agree with the petitioners[5] who state that there is no relationship between a license applicant's ability to pass a Morse code exam and his/her on-air behavior, activity level or "quality" as a licensee. As the Commission itself said in the Restructuring R&O[6] and previously, in the Codeless Technician Decision[7], "passing a telegraphy examination ... is no more and no less than proof of the examinee's ability to send and receive text in Morse code at some specified rate." We regularly receive copies of enforcement letters sent to amateurs by the Commission's Enforcement Bureau and note that since roughly half of these letters relate to operations below 30 MHz, where all amateurs are currently required to have demonstrated code proficiency, there does not appear to be any relationship between passing a code test and operating within the letter and spirit of FCC regulations.

7. The effect of the code requirement and other aspects of the amateur licensing system (primarily at the insistence of the ham community) have been exclusionary, based on the assumption that the world is knocking down the doors to become hams and that we must filter out all but the best and most highly-motivated candidates. If, indeed, that assumption was ever true, it certainly is not true today, and amateur licensing must be made more inclusive, inviting in people with a wide variety of technical and communication interests. We agree with petitioner Holliday that the current code requirements, while less exclusionary than in the past, still effectively exclude many potentially excellent hams from becoming licensed and active; and that if the Commission were establishing Amateur Radio today as a new service, there would be no reason to require knowledge of Morse code.[8]

8. A recent survey of *CQ* magazine's readers[9] indicated that the readership is split 50/50 over the question of whether the Commission should change or eliminate its current code proficiency requirement. It is noteworthy in this regard that, while *CQ*'s readers represent a broad spectrum of active amateur radio operators, an overwhelming

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[5] Coppola, RM-10782; National Conference of Volunteer Examiner Coordinators, RM-10787
[6] FCC 99-412, para 29
[7] PR Docket 90-55, Report & Order
[8] RM-10783, para 5, 6
[9] *CQ* regularly conducts informal reader surveys in the magazine. While not scientific, they provide a relatively accurate "snapshot" of reader opinion on various issues. The September, 2003 survey dealt with actions taken at the 2003 World Radiocommunication Conference and what readers thought the FCC should do in response to those actions. A summary of the survey results is attached as Appendix A.

majority (84%, based on the same survey) currently holds a class of amateur license which authorizes HF operation. This indicates that many *CQ* readers who have already passed code tests support changing or eliminating the code exam as a licensing requirement. We will side with the 50% favoring change. In light of the ITU's action at WRC-03, the Commission's previous statements that a code proficiency requirement no longer serves a valid regulatory purpose, the long-standing "disconnect" between passing a code test and being a "good ham," and the need for the Commission's licensing rules to be more inclusive and inviting to people with a wide variety of technical and communication interests, we support the immediate removal of the code requirement as a component of the amateur licensing structure.

9. While we believe the time has come to eliminate the code test requirement from amateur licensing, we share the concern of FISTS[10] and others that the current license exam structure proves only a candidate's ability to answer multiple-choice questions based on simple memorization. It is all too easy today to pass the General Class and Extra Class license exams on the basis of memorization and rote learning without the necessary understanding to put that knowledge into practice. FISTS is seeking more difficult written exams. However, as long as the exams are in their current format, simply making them harder still will not demonstrate any practical knowledge by the candidate, and will serve only to discourage and exclude potential higher-level licensees.

10. Licensure by government regulatory agencies in virtually any field of endeavor serves to assure that the licensee has met *minimum* standards for the safe and responsible conduct of whatever task(s) the license authorizes. They are not a measure of proficiency, achievement or excellence. A driver's license, for example, is not proof of being a *good* driver. In many other fields of endeavor, from medicine to auto mechanics, private organizations within those fields develop programs to recognize higher levels of education, training, and expertise. Many such programs already exist within amateur radio, including various certifications offered by the American Radio Relay League (ARRL) and the operating award and contest programs sponsored by *CQ*. This is entirely appropriate. FCC amateur license exams should test whether candidates meet the minimum criteria for safe and responsible operation of various types of amateur radio stations. They should not be used as a measure of proficiency or as a tool to either encourage or discourage people from becoming licensed. Certifications of proficiency in various areas, such as technical or operating skills, should be left to the amateur community.

III. Proposals Regarding Operating Privileges for Technician Class Licensees

11. Virtually all of the proposals before the Commission call for some level of HF operating privileges for current Technician Class amateurs. The largest number call for granting them current Novice privileges, while at least one other[11] would go farther and offer voice privileges on 80 and 40 meters not currently available to Novice class

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[10] FISTS CW Club Petition, dated August 22, 2003; no RM- number assigned as of date of submission of these comments.

[11] Beauregard, RM-10781

licensees. Most of the proposals also call for granting RTTY/Data privileges to Technicians within the Novice subbands, while maintaining the Novice class power output level of 200 watts maximum. *CQ* readers, surveyed in the September, 2003 issue, also overwhelmingly support granting some HF operating privileges to Technicians[12], with 63% favoring some change in current privileges, versus 36% favoring no change. Among those favoring change, 43% recommend merging the current Novice and Technician Class licenses and combining their privileges. Another 26% favor not only giving current Novice HF privileges to Technicians but expanding those privileges (for both groups) to include limited voice, CW and data privileges on the HF bands.

12. We agree that Technicians should have HF operating privileges, including RTTY/Data privileges, but in line with the views of many *CQ* readers, we propose several additional changes as well:

a) Merge the current Novice and Technician Class licenses, giving Technicians all current Novice Class privileges *and* giving current Novices all Technician Class privileges. Expiring Novice licenses would be renewed as Technician licenses (as is currently the procedure for renewing Technician Plus licenses). This would help further simplify the Commission's licensing burdens by phasing out the Novice license within ten years;

b) Grant RTTY/Data privileges to Novices as well as Technicians within the current Novice CW subbands on 80, 40, 15 and 10 meters. There is no reason that Novices should be restricted to Morse code within these subbands when others are permitted to use very popular digital text modes here. Again, merging the two license classes and including RTTY/Data in the privileges permitted will accomplish this;

c) Extend Novice/Technician privileges on 10 meters to include the entire band. This is the largest HF amateur band in terms of spectrum space and it is rarely overcrowded, even during the peak of the sunspot cycle when it offers worldwide communications on a regular basis. On the other hand, the segment between 28.3 and 28.5 MHz, where Novices and Technicians with code credit currently may operate voice, is often overcrowded during sunspot peaks, especially during contests, while band segments higher in frequency are virtually empty. There is no valid reason for this artificial compression of band activity. By giving Novices and Technicians access to the full 10-meter band, we can spread out activity and make more efficient use of the spectrum here. In addition, FM repeaters at the top end of 10 meters can provide a good introduction to HF for those Technicians who are already familiar with using repeaters on the VHF and UHF bands. This should also help maintain activity on 10 meters during the upcoming dip in the sunspot cycle.

d) Beauregard's proposal[13] to also grant voice privileges to Technicians on 80 and 40 meters is interesting, but would erode the differences in privileges between Technician and General Class. If the Commission is tied to the current three-class license structure (see below), such a move would be premature.

13. In light of the international changes, and the greater flexibility permitted by the ITU at WRC-03 in reciprocal licensing of foreign amateurs (we realize that the

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[12] See Appendix 1

[13] RM-10781. para 2

Commission has not yet even begun to look at this aspect of the WRC-03 changes, but we are thinking in terms of US amateurs seeking to operate overseas), the Commission might want to consider further simplifying the US amateur licensing structure and adopting a two-class structure more in line with the current CEPT license structure in Europe. We realize that it is uncertain at this time how that structure might change as more countries in Europe eliminate their code requirement for HF operation. We also realize that this would represent a radical change in US licensing philosophy, essentially rolling back incentive licensing and returning to a two-tiered license structure in which everyone has essentially the same operating privileges. This might be too much for some traditionalists ... but on the other hand, these would be many of the same people who are still complaining about incentive licensing 40 years after its inception. (An even more radical step would be to have a single class of amateur license granting all operating privileges. But we won't go that far, as we wouldn't want to be responsible for a rash of heart attacks and strokes.)

IV. Proposals Regarding Element Credit and Other Examination-Related Topics

14. Several petitioners proposed various changes (in line with their proposals for changes in the code requirement) in element credit currently granted by Section 97.505 (a) of the Commission's Rules. We propose further simplification and an end to the inherent unfairness of the current rules, in which a holder of an expired pre-1987 Technician Class license gets lifetime credit for Elements 1 and 3, but a holder of an expired General, Advanced or Extra Class license of the same vintage gets no element credit whatsoever; or that a current Technician passing a code test gets only one year of element credit toward a future upgrade, while a former Technician licensed prior to 1991 has lifetime element credit for the same exam. We propose granting lifetime credit for any exam element previously passed in qualifying for any class of amateur license. We propose modifying Section 97.505(a) to read as follows (if Element 1 is eliminated):

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§97.505 Element credit.
(a) The administering VEs must give credit as specified below to an
examinee holding any of the following license grants or license
documents:
(1) An unexpired or expired FCC-granted Amateur Extra Class operator
license grant: Elements 2, 3, and 4.
(2) An unexpired or expired FCC-granted Advanced Class operator license
grant: Elements 2 and 3.
(3) An unexpired or expired FCC-granted General Class operator license
grant: Elements 2 and 3.
(3) An unexpired or expired FCC-granted Technician Plus, Technician or
Novice Class operator license grant: Element 2.
(4) A CSCE: Each element the CSCE indicates the examinee passed. CSCEs
will not expire even if they indicate a 365-day limit on element
credit.
(5) An expired FCC-issued Technician Class operator license document
granted before March 21, 1987: Element 3.
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If Element 1 is *not* eliminated, we propose the following changes to Section 97.505(a):

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§97.505 Element credit.
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(a) The administering VEs must give credit as specified below to an
examinee holding any of the following license grants or license
documents:
(1) An unexpired or expired FCC-granted Amateur Extra Class operator
license grant: Elements 1, 2, 3, and 4.
(2) An unexpired or expired FCC-granted Advanced Class operator license
grant: Elements 1, 2 and 3.
(3) An unexpired or expired FCC-granted General Class operator license
grant: Elements 1, 2 and 3.
(4) An expired FCC-issued Technician Class operator license document
granted before March 21, 1987: Elements 1, 2, and 3.
(5) An unexpired or expired FCC-granted Technician Plus Class operator
(including a Technician Class operator license granted before February
14, 1991) license grant: Elements 1 and 2.
(6) An unexpired or expired FCC-granted Technician Class operator
license grant: Element 2.
(7) An unexpired or expired FCC-granted Novice Class operator license
grant: Element 1.
(8) A CSCE: Each element the CSCE indicates the examinee passed. CSCEs
will not expire even if they indicate a 365-day limit on element
credit.
(9) An unexpired or expired FCC-issued commercial radiotelegraph
operator license or permit: Element 1.
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These proposed changes would apply *only* to element credit for those seeking to upgrade a current license or to return to amateur radio after allowing their licenses to lapse. We propose *no* change in the current 10-year license term; the need to hold a current, valid, license in order to transmit; or the need to renew within the specified renewal/grace period in order to retain a current callsign. Former amateurs who become relicensed under these provisions would be able to apply for their former callsigns, should they desire and if the calls are available, through the vanity callsign system.

15. FISTS proposes a ban on re-taking a failed test element again on the same day[14], to discourage people from retaking an element multiple times at one session until they finally pass, based less on what they know but on seeing so many variations of the exam questions that they eventually figure out how to correctly answer enough to pass (or simply get lucky). In addition, FISTS points out that this places a strain on the Volunteer Examiners (VEs) and the Volunteer Examiner Coordinators (VECs), who must provide enough different versions of each exam to assure that no one takes the exact same test twice at the same session. We support this proposal, although it will be difficult from a practical perspective to prevent someone from traveling from one test session to another to retest on the same day. This would only be discovered after the fact by the VEC, *if* both sessions were coordinated by the same VEC. If two sessions were coordinated by different VECs, there would be no way to know if the same person attended both. As a more practical suggestion, we would modify the FISTS proposal to prohibit a candidate from re-taking a failed examination element on the same day *at the same test session*.

16. FISTS also proposes that the Commission return to specifying in the Rules a syllabus of topics for each written exam element. Prior to restructuring, the Rules

[14] FISTS petition, paragraphs 30-31.

micromanaged this, saying how many questions each test must include on each specific topic. In the restructuring decision, the Commission eliminated this entirely, giving the VECs (through their Question Pool Committee, or QPC) complete flexibility in designing the tests and the question pools. FISTS feels this vests too much authority in a group (the QPC) that is not accountable to either the FCC or the amateur community. Their petition seeks a partial return to FCC control over the test makeup, proposing three broad topic areas and a set percentage of questions in each[15]. We agree in principle with this proposal as we believe the Commission went too far in the restructuring decision in giving the QPC too much power with too little accountability. FISTS's proposal for spreading the questions across the three categories it proposes (operating procedures & practices; technical topics; RF safety) are acceptable to us for Elements 2 and 3. However, we believe that knowledge of proper operating practices and techniques are as important as technical knowledge for an Extra Class licensee, and that many long-licensed upgrade candidates may know nothing about the relatively-recent RF safety rules. For Element 4, we would propose a balance of perhaps 20/25/5 questions, respectively, in each of the proposed categories instead of FISTS's proposed 15/35/0.

17. Finally, we believe there needs to be more Commission oversight of the QPC, perhaps including a requirement that question pool syllabi and question pool revisions be approved by Commission staff before a final release to the public. In addition, we propose that the Commission specify in the rules not only a minimum number of questions in the pool ("...at least 10 times the number of questions required for a single examination" - Section 97.523) but also a maximum, perhaps "no less than 10 times and no more than 12 the number of questions required for a single examination." This would keep the QPC from getting carried away as it did recently with the current 510-question pool for a 35-question test on Element 2.

V. Summary

18. In conclusion, CQ strongly believes that Morse code continues to be extremely valuable and relevant to the Amateur Service as an operating mode. However, we agree with the Commission that it no longer has regulatory value as a required test element, and we support the elimination of the code proficiency test requirement from the FCC's Amateur Service rules.

19. We propose merging the Novice and Technician Class licenses, giving Novices all VHF/UHF privileges and giving Novice HF privileges to Technicians; and renewing expiring Novice licenses as Technician licenses. We also propose granting RTTY/Data privileges to Novices and Technicians on the Novice subbands on 80, 40, 15 and 10 meters, where their operation is currently limited to Morse code (CW) only; and expanding Novice/Technician privileges on 10 meters to include the entire band and all available modes. We also suggest that the Commission in the future consider the possibility of further simplification of the US amateur licensing structure to more closely parallel the European CEPT structure.

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[15] FISTS petition, paragraphs 32-35 and Appendix, proposed revision to Section 97.503(c)

20. We further propose simplifying the current rules on examination element credit by making all element credit permanent, including expired licenses of all classes and CSCEs more than one year old. Again, this would apply only to element credit for those seeking new or upgraded amateur licenses.

21. We support the FISTS proposal to limit retaking a failed exam element on the same day, but for practical reasons, suggest that candidates be prohibited from retaking a failed element on the same day at the same test session.

22. Finally, we support in principle the FISTS proposal for restoring to the Rules some specific guidelines for the structure of amateur exams. We also propose that the Rules specify a maximum as well as a minimum number of questions in each question pool, and that the Commission exercise greater oversight over actions of the Question Pool Committee in designing and writing amateur exam questions and test elements.

Respectfully submitted,

CQ Communications, Inc., by

Richard S. Moseson, W2VU
Editorial Director

Appendix 1

Summary of Results
CQ magazine Reader Survey
September, 2003

Reader surveys appear regularly in *CQ*, seeking reader opinion on various issues facing amateur radio. Demographic information about the responders is requested as well. The September 2003 survey, dealing with decisions made at the 2003 World Radiocommunication Conference and recommendations for FCC action in response to those decisions, prompted more than 400 replies. The numbers reported here are based on tabulations of 419 responses, although more were still arriving at our offices and had not yet been tabulated. Typically, late returns do not significantly alter the overall responses.

The following includes questions asked and percentages of responses.

Please indicate…

1. ... whether you agree with the decision at WRC-03 to leave the question of code tests up to each country to decide:

Response	% of all respondents
Yes	78%
No	22% *

(* Based on responses to other questions, it would appear that some of the 22% who disagreed with the WRC-03 action did so in the belief that it did not go far enough in eliminating the code test requirement. We did not separate out these responses for additional analysis.)

2. ... whether you think the FCC should (choose one):

Response	% of all respondents	% of those with positive response
Eliminate the code test requirement for all amateur licenses	25%	51%
Eliminate the code test requirement for General, but keep for Extra	21%	42%
Replace the current 5 wpm code test with a code recognition test or similar	4%	7%
Leave the code test requirement as it is	50%	XXX

(Continued on following page)

3. ... whether you think the FCC should (choose one):

Response	% of all respondents	% of those with positive response
Merge the Novice and Technician licenses, combining privileges for both classes	27%	43%
Expand Technician privileges to include all current Novice HF privileges	9%	14%
Expand Technician privileges to include only Novice HF voice privileges (28.3-28.5 MHz)	6%	9%
Expand Technician privileges to include only Novice HF CW privileges	5%	8%
Expand Technician and Novice privileges to include HF subbands offering voice, CW and data at limited power levels	16%	26%
Make no change to current Technician or Novice privileges	36%	XXX

4. ... ... whether you think the FCC should (choose one):

Response	% of all respondents
Lift restrictions on international third party messages, allowing U.S. hams to pass third-party traffic with any other country that permits it	46%
Leave current international third party traffic rules in place	33%
No opinion	20%

5. ... whether the ARRL should ask Congress to change the law to allow the FCC to permit operation in the U.S. by any licensed amateur, even if that ham is not a citizen of the country in which he/she is licensed:

Response	% of all respondents
Yes, as a high priority	5%
Yes, as a low priority	18%
No, leave as is	66%
No opinion	11%

Selected demographic information:

Frequencies on Which Active:	% of all respondents
HF	75%
VHF	70%

(Continued on following page)

Selected demographic information, ctd.:

Current License Class:	% of all respondents
Amateur Extra	58%
Advanced	8%
General	17%
Technician Plus	1%
Technician	16%
Novice	0%
Not licensed	0%

Number of Years Licensed:	% of all respondents
Less than 5	12%
5-15	27%
15-25	9%
More than 25	52%

Age group:	% of all respondents
Under 35	2%
35-45	7%
45-55	18%
55-65	36%
65-75	21%
Over 75	10%

(End of Appendix 1)