COMMENTS IN OPPOSITION TO PROPOSALS THAT SEEK TO FURTHER REDUCE LICENSE TESTING STANDARDS WITHIN THE AMATEUR RADIO SERVICE

I oppose any further reduction in license testing standards in general, and as it relates to this petition, Morse code testing in particular. I support any effort to increase testing standards, particularly for Morse code and technical theory. My reason is that Morse code and technical testing are essential in enabling the amateur radio service to perform its mission as set out in Section 97.1 of the Commission's regulations.

1. Morse proficiency is one of the few remaining incentives for technical self-training among amateurs, particularly as it relates to the design, construction, modification, and repair of CW only transmitting and receiving equipment.

2. The International Morse Code is used extensively in amateur experimentation in advancing the radio arts, particularly in those areas where there is little or no commercial research being conducted. An example is the use of high-speed CW in the study of meteor scatter propagation.

3. Morse proficiency is critical to the amateur community's ability to foster international goodwill, as most foreign amateurs do not have sufficient skills in conversational English for effective voice communications with Americans (who are notoriously illiterate in any language other than English). Many foreigners therefore rely upon CW for their international communications, especially with American amateurs.

4. Emergency communications on High Frequency are routinely conducted by single side band voice emissions, with CW being resorted to whenever conditions deteriorate to the point that single side band voice is ineffective.

5. CW is on a par with SSB voice as one of the two most popular means of amateur communication, but CW operators are generally acknowledged as having greater skill than the majority of operators who confine themselves exclusively to radiotelephone emissions. If the Commission's stated goal of maintaining a reservoir of trained operators as a national resource remains valid, CW proficiency should remain as a testing requirement.

It is not realistic to suppose that Morse proficiency will exist in the future to any significant extent among new amateurs, if new licensees are not required to pass a proficiency test. Moreover, the value of Morse code proficiency to the stated public interest goals of section 97.1, as set out above, is well understood within the amateur community. In the event that the Commission further reduces Morse testing, or abolishes it, then the Commission must, in my view, take one of the following additional actions: (1) reaffirm the provisions of 97.1 as setting forth the mission of the amateur service; (2)

revise Section 97.1 by setting forth the Commission's vision for the future of the amateur service; or (3) acknowledge that amateur radio is a pure hobby no longer having any substantial public interest value.

Finally, it has been claimed that Morse proficiency testing constitutes a particularly heavy burden on volunteer examiners. Such contention is preposterous for reasons too obvious to require a response. I believe that the credibility of any petitioner who make such a patently fallacious assertion must be regarded with a degree of skepticism, and that all other assertions by any such petitioner must be carefully scrutinized.

Respectfully submitted,

Kenneth S. Cannaday, W4NZC

Shelley L. Pendleton, AE4HD