To the Commissioners:

I wish to comment on Docket 98-143, which proposes to remove the 5 wpm Morse requirement for amateur radio licensees to operate on HF. I believe strongly that the Morse requirement should be maintained. Indeed, I believe that it may be valid to require mastery of Morse for ALL amateur licenses, with a single exclusion which I shall address later.

Arguments for removing the requirements are flawed. The first flawed argument is that CW is just another mode of operation, like SSB, SSTV, RTTY, for example. In fact, while CW is one of many modes of operation, learning Morse code is a skill, not a mode, and this differentiates CW from all other modes of operation. Any amateur may operate SSB, SSTV or RTTY without having to master a skill, merely by installing and operating special equipment; knowledge of the underlying technologies is not even required. To operate CW, however, an amateur must learn to receive and transmit Morse code, a skill. This demonstrates the distinction between CW and all other operating modes.

The next flawed argument for removing the Morse requirement is that CW is an antiquated mode of operation. It is true that no commercial or military service uses Morse code any more. However, the value of CW should not be judged solely by its viability in commercial or military settings. CW is a flourishing mode of amateur operation, as surveys have shown. A quick check of the HF CW sub bands during the large contests demonstrates its popularity. DXpeditions and other weak-signal operations (such as VHF/UHF meteor scatter and aurora operation) regularly rely on CW for success. CW traffic handling remains a robust activity. In summary, far from being obsolete, CW is, and has been for almost a hundred years, a vital and popular form of amateur operation that is central to both HF and VHF/UHF activity.

The third flawed argument for removing the Morse requirement is that Morse code is difficult and/or impossible to learn. Medical research has demonstrated that only a very small percentage of the population suffers from an inability to match sounds to letters. The Lindamood-Bell studies demonstrate the extremely low incidence of this disability in the general public. Thus, research demonstrates that learning to copy and send Morse code is rarely impossible.

It is true, however, that injury or other handicaps, such as deafness, may impede an individual's ability to receive and/or send Morse code. Although amateur operators for decades have overcome such constraints with imaginative adaptive devices, or shifts to alternate operating modes, it does seem reasonable to consider exempting duly-documented applicants from the Morse requirement on the basis of physical disability.

Another flawed argument is that the requirement to learn Morse code is a primary reason why more people are not joining the ranks of amateur radio licensees.

There is no Morse constraint to people becoming amateur licensees: the Technician class license does not require knowledge of Morse code. A related flawed argument is that the Technician class privileges are so limited that many grow bored and do not renew their licenses. There are so many varied and engaging technical and operating alternatives in VHF/UHF that this argument simply is not supportable. Extremes of propagation operations, space-related operations, EHF challenges, not to mention contesting and public service, are all available to the Technician. Indeed, every operating and technical opportunity available to HF operators is available to VHF/UHF-only licensees.

It should also be noted that the Commission has created
To understand the relationship between the Morse requirement and granting of HF privileges, the Commission must look back prior to the institution of incentive licensing. At that time, all amateur operators had to demonstrate mastery of Morse at a minimum 5 wpm. General class licensees were required to demonstrate mastery of Morse at 13 wpm and Extras at 20 wpm. The General, Advanced and Extra class licensees all had the same operating privileges, including HF privileges, even though their Morse requirements were different. Not only HF privileges, but all operating privileges, were tied to a Morse requirement for all amateur licensees.

With subsequent restructurings, the Morse requirement has been removed from some classes of license and lowered to 5 wpm for all classes of license. The Commission should analyze the effect of these changes have had on the amateur population to determine whether it has been beneficial. Possible metrics could include number of licensees renewing, number of licensees upgrading, number of licensees participating in public service activities, number of licensees subject to disciplinary action, number of licensees participating in ongoing educational activities, etc. It would seem prudent for the Commission to gather objective data on the effect of lowering or removing the Morse requirement before acting on the proposed docket.

It should also be noted that the Commission has created a number of alternative code-free radio operating services, such as the Citizens Radio Service and the Family Radio Service. These services are viable alternatives for people who wish to enjoy a radio hobby without technical requirements of any kind, including knowledge of Morse code.

The argument that administering the Morse element to licensee candidates is an undue burden on volunteer examiners is simply ludicrous and unworthy of a response.

Finally, I believe that removal of the Morse requirement will inevitably lead to withering of CW on all bands, HF and VHF/UHF, over time. Without the requirement to learn the basic skill, few may attempt it, and exposure to Morse as a basic requirement has always led to a significant influx of new CW operators.

This will have a substantial negative effect on amateur operations, many of which I have noted above. It will have no substantial positive effect on the amateur radio service.

Respectfully submitted,

Peter S. Alterman, Ph.D.
W2CDO