September 25, 2003

Federal Communications Commission

Re: RM-10787

Comments from those that support reducing licensing requirements lean in the direction of how it personally affects their or their friends' privileges, not the selfless support of the amateur service. Putting aside the question of whether of not Morse is a proper test part of the curriculum, few address the issue of the proper licensing requirements. Forgotten is the fact that society has chosen to give the amateur service frequency allocations in exchange for them.

Part 97 states:

Quote

§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.

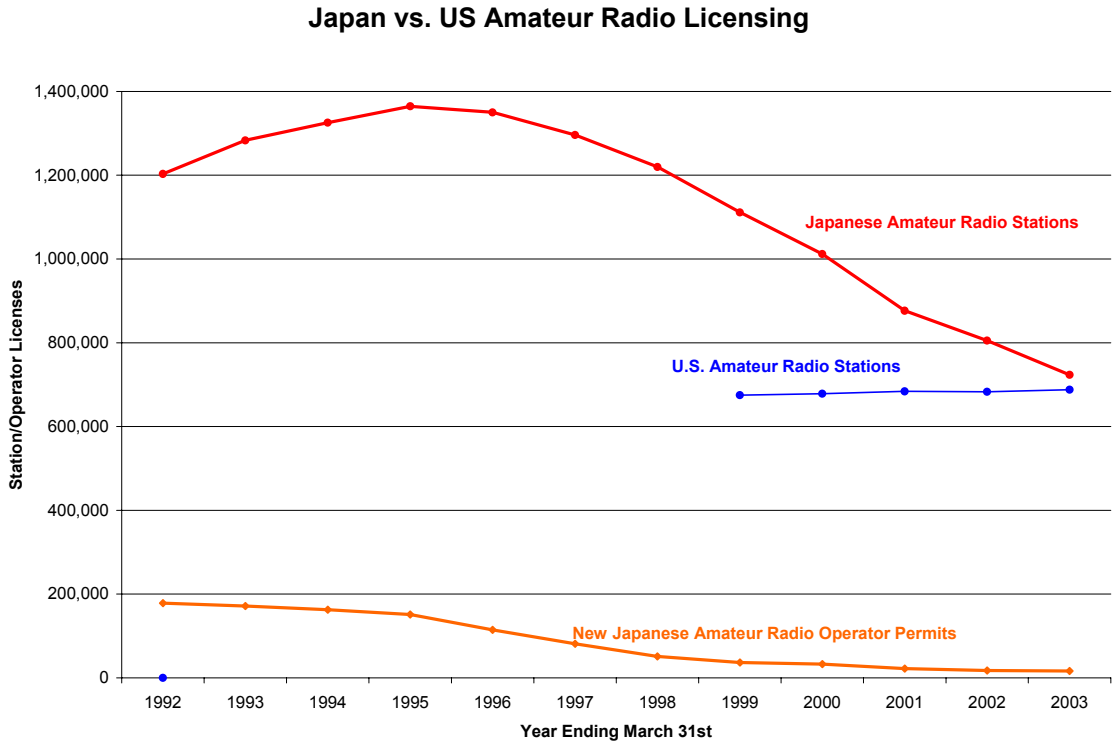
(e) Continuation and extension of the amateur's unique ability to enhance international goodwill.

Unquote

The NCVEC petition doesn't address any of the above amateur service obligations. Clearly continuing a Morse code requirement does not detract from our contributions. The primary reason this petition has been submitted is to lower requirements in the expectation that the amateur service will grow, and their business interests will be promoted. It is self serving to suggest larger numbers of amateurs will protect the service. The interests of VECs, their related publications businesses, and other publications like CQ magazine are served, at least in the short term, by large numbers of new hams. It is not in their interests to increase the quality of amateur operators and to document what we do for society in exchange for frequency allocations.

If the trend toward reducing licensing requirements continues, ultimately FCC review of frequency allocations for the amateur service versus others providing more services to the public will lead to the loss of all our privileges.

Furthermore, the hope that the reduction of licensing requirements will produce a large permanent number of amateur is forlorn. Japan provides compelling data showing our possible future. There has been no CW requirement for the entry level HF license (all HF bands except 20 meters) since the 1950's. Here are the recent results as the large new numbers of Japanese licensees are letting their licenses lapse.



The number of stations peaked at close to 1.4 million in 1995. By June 2003 the number had declined to less than 710,000. The numbers are still falling at 15,000 per quarter. This petition will contribute to the same kind of numbers "bubble" in the U.S. The Commission, and those that would support the reduction of requirements, should carefully consider the long-term consequences of their actions.

Please reject this petition and instead consider revising Part 97 to better document amateur service contributions to society and allow (require?) the service to periodically demonstrate them to the Commission. Any new rule making should ask of the commenters how the amateur service will be better able to contribute to society as a result of regulation changes, other than just increasing the number of less skilled operators. Better we face this issue while Amateur Radio is still strong enough to plan its role in the 21st century.

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