

The Service Rules in Title 47, Part 97.1 of the Code of Federal Regulations part (a) and (d) can be easily achieved without removing the CW element 1 requirement for Amateur Services. Simply remove the requirement to show the ability in Morse, for HF privileges. Give those privileges to anyone who can pass the written exams, but retain the requirement for testing in Morse, for anyone who wants to USE Morse. Morse is a skill, unlike other modes of operation, and thus justifies its own skills test.

Petitioner states that "the international community has decided that this is no longer the case, and that proficiency in CW is optional" This is true, that the ITU removed the requirement for CW testing for an amateur to obtain a license to operate in the HF bands, but nothing at all was addressed that anyone was to be given a license to operate CW with or without testing. In other words, give everyone the right to HF, but require CW testing for those who wish to use it on the bands. This would not preclude anyone from obtaining a ham license for HF operations, or the building up of the pool of available stations for emergency situations, and have no ill affect at all on the implications for Homeland Security. As to making changes effective immediately: this is a large fundamental change and must not be done until approval, one-way-or-the-other by the Commission.