

Comments on RM-10781  
28 September 2003  
From: Scott Cowling, WA2DFI

Background:

I was licensed as a Novice in 1967 at age 14, General in 1968, Advanced in 1969 and Amateur Extra in 1982. I have been on the air continuously with no periods of inactivity since 1967. I have been involved in RACES and NTS. I have both built my own gear and purchased it ready to use. I currently am an advisor for Explorer Post 599, a ham club for teens. I operate nearly 100% CW on the HF bands as well as AM and FM above 50 MHz. I am an engineer with an MS in Electrical Engineering, which I attribute directly to my early experiences in amateur radio. My purpose in including this information is just to show that I am writing from the perspective of an experienced and well-rounded amateur.

In the matter of RM-10781, I would like to briefly summarize and comment on this petition. The implicit assumptions that Mr. Beauregard has made are as follows:

1. Technician class licensees should be encouraged to upgrade.
2. Allowing Technician class licensees HF CW privileges would encourage upgrades.
3. A "practice" area on HF would help Technicians bring up their Morse speed.
4. The benefits of HF long distance propagation would be an incentive to upgrade.

While I agree with the first statement, I must strongly disagree that any of the remaining three assumptions result in any increased incentive for a Technician licensee to upgrade.

The dictionary defines incentive as "Something, such as the fear of punishment or the expectation of reward, that induces action or motivates effort." It is not clear to me how rewarding Technician licensees with HF privileges in advance gives them incentive to upgrade. To make it a true incentive, the reward must occur after the effort has been expended to improve skill.

As a CW operator, I have a serious problem with the idea of an on-the-air "practice area", especially in the HF spectrum where the potential for worldwide interference is possible. This area would be accessible by FCC licensed individuals with no demonstrated Morse sending or receiving ability whatsoever.

The Morse testing requirement originated from a need to prevent interference. Allowing Commission licensees to operate in any HF CW band without a demonstrated ability to send and receive Morse code is not consistent with the basic purpose of the Morse requirement.

In summary, I ask that RM-10781 be denied for the above reasons.

Sincerely,  
Scott Cowling  
Amateur Radio Station WA2DFI