

Comments on RM-10786
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-10786, I would like to briefly summarize and comment on this petition. In spite of rather the lengthy 20-page petition in which many opinions are represented as facts, RM-10786 has made eight assertions. I will comment on each one below.

Assertion #1:

The Commission is no longer bound to maintain any Morse proficiency requirement.

Certainly this is correct: the Commission is not now bound to maintain any Morse proficiency requirement. However, Article 25 of the ITU regulations begins "Administrations shall determine..." This clearly puts the burden on the Commission to "determine" the Morse testing requirement, not delete it altogether.

Assertion #2:

A Morse proficiency requirement does not comport with the basis and purpose of the Amateur Service.

After reading FCC Report and Order 99-412 adopted Dec 12, 1999, paragraphs 22-39, I come to different conclusions than NCI has stated in RM-10786. In its R&O, the Commission stated "the emphasis on Morse code proficiency as a licensing requirement does not comport with the basis and purpose of the Amateur Service" (R&O 99-412, para 30). It is the *emphasis* on Morse that is referred to, not the Morse requirement itself.

Assertion #3:

It is within Commission authority to remove the Morse requirement without formal notice and public input.

Whether or not it is within Commission authority to remove the Morse requirement without public comment seems somewhat irrelevant. In my opinion it is much more important to ask for input in order to reach a well thought out decision. On an issue so important to the Amateur Service, what is to be gained by NCI's insistence on quick action? The Morse requirement has been with us for many decades; surely time for formal notice and public input is time well spent.

Assertion #4:

Maintenance of the Morse requirement is contrary to one of the Commission's statutory mandates.

NCI quotes in their petition USC title 47, chapter 5, subchapter III, part I, sec 303(g) which defines one of the Commission's duties: "Study New uses for radio, provide for experimental uses of frequencies, and generally encourage the larger and more effective use of radio in the public interest." The assertion is that keeping the Morse requirement is contrary to this duty. Frankly, this is ridiculous. Eliminating testing altogether would encourage the "larger" use, but it would hardly be "effective". The Commission is acting in the public interest whereas NCI, a special interest group, is acting on behalf of only a vast minority of the "public".

Assertion #5:

Maintenance of the Morse requirement is the biggest single impediment to recruiting new Amateurs.

Notwithstanding the ARRL and QCWA comments, I respectfully disagree that the 5 WPM Morse requirement is a barrier to "technically qualified operators". Perhaps at 13 or 20 WPM, where many hours of practice are necessary to achieve good copy, Morse requirements are a barrier. However, these speed requirements are a thing of the past.

When I was a young ham living in the NYC area, at radio club meetings I talked to a newly licensed Technician class licensee that had learned Morse well enough to pass the 5 WPM FCC exam by *studying on the train ride into NYC*. Granted, not everyone can do that (the ride was about an hour). In my experience, claimed inability to learn Morse at 5 WPM is much more likely to be due to lack of motivation, rather than lack of ability.

As for recruiting prospective new Amateurs, I do have some experience in this area that I would like to relate. I serve as an Associate Advisor for local BSA Explorer Post 599, a ham club for teens. In the last few years we have provided Amateur Radio demonstrations in public places, such as the Arizona Science Center, the Gilbert High School Science Fair and various Scouting events such as Jamboree-On-The-Air and Scout-a-Rama. Invariably the biggest attraction at these demonstrations is the HF CW

station. Young people aren't too drawn in by an SSB or FM voice signal, but the Morse code emanating from the speaker draws them like a magnet.

Assertion #6:

Retaining the Morse requirement will place current and prospective Commission licensees at a disadvantage compared to individuals in other countries.

I have read and re-read paragraphs 27 – 32 of the Petition and still fail to see how keeping the Morse requirement will put American Amateurs at a “disadvantage”. If anything, it will put us at an advantage. Throughout the history of Amateur Radio, America has led the way with skilled operators, state-of-the-art apparatus and technological breakthroughs. Eliminating the Morse requirement simply because others do is the action of a follower, not a leader.

Assertion #7:

No legitimate regulatory or technical reasons exist for maintaining a Morse requirement.

I respectfully disagree with this statement.

In paragraph 4 of RM-10786, NCI states, “...the covert objective of that change [raising the speed of Morse tests] was to control the number and growth of voice operators...” There seems to be very little “covert” about it; the action by the ARRL Board appeared in the minutes, printed in QST for June 1936 on page 27. The fact of the matter is that any testing whatsoever serves to “control” the number of new licensees. The tricky part is to balance difficult testing requirements (lower numbers of more qualified and/or motivated licensees) with easy testing requirements (higher number of less qualified and/or motivated licensees).

Notice that I said qualified and/or motivated. Most of the discussion on whether to drop the Morse requirement seems to focus on the quality of operators, usefulness of Morse as a communications mode, who else had dropped it use, etc. In order for Amateur operators to be effective in upholding the Basis and Purpose stated in Part 97, they need not only training (which leads to skill) and minimum technical competency (assured by testing), but *motivation*. They must want to help with **emergency communications**; they must be willing to **contribute to the advancement of the radio art**; they must want to improve the Amateur service through their **advancing skills in both the communication and technical phases of the art**; they must want to become part of the pool of **trained operators, technicians and electronics experts**; they must be willing to be ambassadors of **international goodwill**. (Bold text verbatim from Part 97, subpart A, sec 97.1, Basis and Purpose.) All of these actions of the ideal individual fulfilling the Basis and Purpose of the Amateur Service hinge on motivation.

In my opinion, this is the remaining reason, and an overwhelming one, to keep the Morse requirement. If a prospective licensee is not willing to spend the few hours necessary to

learn Morse code on a rudimentary level (most all agree that 5 WPM is rudimentary), it is indicative of a lack of motivation that will surely manifest itself later as a lackadaisical attitude toward the very goals of the Amateur Service.

Assertion #8:

Retaining the Morse requirement is detrimental to the future health of the Amateur Service.

For the above reasons, I believe that just the opposite is true. When I was 14, I opposed the Morse requirement. However, it was a requirement, and I learned it. I now operate almost exclusively CW on the HF bands. I would have missed the enjoyment I now derive from this activity if it had not been required in 1967. Much the same as a schoolboy who doesn't want to have to read Dickens or learn Calculus because he "sees no use for it", so Morse testing will help keep licensees well rounded and maybe introduce them to something enjoyable.

In closing, I would like to ask a few questions that may be relevant should RM-10786 be adopted.

1. Would new licensees be permitted to operate their transmitters on HF CW without any demonstrated proficiency in sending or receiving Morse?
2. If not, then would there not effectively be six classes of licensee (Technician, Technician+, General, General+, Extra and Extra+)?
3. If so, how would the Commission mitigate any potential worldwide interference that these untrained operators could cause?

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, RM-10786 does not address the issues (paragraph 48 specifically requests that they *not* be addressed) of band segmentation, changes in operator privileges or number of operator classes. It proposes a simplistic "quick fix" that has far reaching implications for the Amateur Service.

I ask that RM-10786 be denied for the above reasons.

Sincerely,
Scott Cowling
Amateur Radio Station WA2DFI