Comment on RM-10781, 10782, 10783, 10784, 10785, 10787

I oppose removal of the Morse code element as a requirement for amateur access to HF bands. The arguments presented in various petitions are addressed below.

1. Because WRC-2003 removed the requirement for Morse code, the FCC should automatically remove it from part 97.

The WRC did not remove the requirement for Morse code, but instead allowed each jurisdiction to decide what Morse requirement should be required for amateur service. The fact that the WRC did not remove the code requirement shows that there were substantial reservations on the part of the WRC in spite of years of effort by groups dedicated to eliminating the code. The code should be retained for reasons outlined below.

2. Digital modes provide greater weak signal capabilities than CW.

While this is true, it avoids the fact that digital modes require more complex equipment, including a SSB capable transceiver and a computer. One of the purposes of Amateur radio is to improve international good will. In a great many countries DX operators use CW as their prime mode because of the simplicity and low cost of the equipment required. US amateurs need to be able to communicate with these stations in order to fulfill this objective.

3. By eliminating the code requirements, more operators will join the amateur service thereby increasing the pool of available stations in time of emergency.

There is no evidence to support the claim that the number of amateurs will increase if the code requirement is dropped and certainly none cited in any of the current petitions.

Emergency communications is just one of the five fundamental purposes of amateur radio. Adequate emergency service can be provided by the existing amateur population. This is evidenced by the success of the current ARRL emergency communications training program.

4. Amateur radio service should be more “inclusive.”

Three of the five functions of the amateur service, to advance the radio art, to improve communication and technical skills, and to increase the number of trained radio operators and electronic experts are at odds with this goal. Only those willing to train and develop their skills over a number of years hold potential for fulfilling these three goals.

5. The code requirement limits the ability of handicapped people to attain a license.

Sufficient exemption for people with disabilities already exists. This may need to be expanded but this procedure is essentially already in place.

6. The code serves no useful purpose.

It is useful to be able to communication with the thousands of US and foreign Amateurs who use CW as the only means of communications because of low cost, simplicity and excellent weak signal characteristics. The need to establish communications with a CW station may arise in an emergency or when fulfilling the amateurs roll in improving international good will by contacting CW DX stations.

7. There is no clear rationale for using Morse code proficiency as a gatekeeper.

As stated above, valid reason for requiring code proficiency for HF include:

- Ability to communicate with thousands of other amateurs who exclusively use CW due to low cost, simplicity and excellent weak signal characteristics
- Be able to communicate with less affluent DX stations who cannot afford expensive, high power SSB equipment
- Be able to understand what is being sent by CW in case of a national or international emergency

8. The Morse code requirement is keeping otherwise qualified individuals, some with “vast knowledge” in electronics, from operating on the HF spectrum.

As a volunteer instructor I have taught a Technician plus code class for 3 years and have observed that students who follow the recommended study guidelines for the code have always been able to pass the code element. (Those students who do not study do not pass.) Students who have passed the Morse Element range from 9 to 70+ years old.

Presumably these individuals with “vast knowledge” of electronics hold a bachelors degree in engineering, physics, or similar discipline. Dedicating 50 or 60 hours to learning the code is insignificant compared to the number of hours these individuals must have spent developing competency in calculus, complex numbers, or any of the basics required to gain mastery of a subject such as electronics.

Individuals who are qualified in terms of electronics but don’t have the discipline to achieve the very basic 5 WPM requirement are simply demonstrating that they are

not willing to acquire the skills and knowledge necessary for good amateur operation. Therefore they are not good candidates for amateur radio.

9. The CW examination proves burdensome on VE teams.

I personally know at least 6 volunteer examiners that have never expressed this view. In any case, the code currently is and should be a future requirement regardless of this sudden allegation of placing a burden on the VE teams.

I have been a licensed amateur for 10 years and currently hold a General class license.

Thank you for considering my views in this matter.

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