

Comments on RM-10787  
27 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-10787, I would like to briefly summarize and comment on this petition.

Normally I would limit my comments to the merit of the points in the proposal. However, the conflict of interest present in this petition is so blatant that I must comment on it. After the restructuring of April 15, 2000 when Morse proficiency requirements were reduced to 5 WPM for General and Extra class exams, a flood of new applicants resulted, the likes of which we haven't seen before. Since the VECs are in "business" to give exams, it only makes sense that they would favor reducing the testing requirements. Easier tests mean more applicants. More applicants mean more test fees. The best interests of the Amateur Service and the NCVEC do not necessarily coincide.

That said, RM-10787 has made three main assertions. I will comment on each one below.

Assertion #1:

Morse testing is an unnecessary burden to:

1. the applicant (due to the stress of testing)
2. the VEC system (due to testing expenses)
3. the Amateur Service (due to loss of potential licensees)
4. the FCC (due to future waiver processing)

*Of course* the Morse test is a burden to the applicant. So is the written test; should we abolish that, too? If it serves a purpose, the burden is justified.

Morse testing is also a burden to the VEC system, but they are paid to perform this service. (As an aside, in the event that Morse code testing is discontinued, I hope that the Commission will reduce the allowed examination fees by a large amount in light of the significant work that it will save the VECs.)

The key point here is "unnecessary". While the NCVEC has presented some real burdens, they have not specified why they are unnecessary.

The “loss to its ranks of a large number” of operators (potentially excellent or otherwise) is the NCVEC’s opinion and as such is pure conjecture. As I will argue below, a contrary opinion is that the Morse requirement is actually *protecting* the Amateur Service from motivational dilution.

The potential burden on the Commission from continued Morse testing is a tenuous conclusion at best, since it involves predicting future workload in response to an unknown number of waivers that have not been filed yet.

Assertion #2:

The Morse proficiency requirement is

1. a barrier to otherwise qualified individuals
2. an unnecessary and artificial impediment to fuller use of the Amateur spectrum
3. the reason licensees are not upgrading to General or Extra

I respectfully disagree that the 5 WPM Morse requirement is a barrier to “otherwise qualified individuals”. Perhaps at 13 or 20 WPM, where many hours of practice are necessary to achieve good copy, Morse requirements are a barrier. However, proficiency at these speeds is no longer required for any Amateur license.

Barring any scientific study, these perceived “barriers” are no more than one group’s opinion. I offer an equally valid and opposing opinion. Morse proficiency at 5 WPM is no barrier at all to a licensee that is motivated to become an Amateur operator. Lack of this motivation is more likely the cause of this phantom “barrier” or unwillingness to upgrade. I seriously question the value to the Amateur service of licensing individuals that are not willing to spend even a few hours learning a basic skill.

All testing presents a barrier of some sort to someone. That is its intended function. The task 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).

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*. This seems to be overlooked in the face of pervasive reductions in competency requirements in the pursuit of the ultimate goal of sheer numbers. Of course there will be more licensees if we make the test easier. But will these new licensees feel the motivation to contribute effort to the advancement of the Amateur Service?

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 #3:

Morse proficiency is not an indication of a quality operator.

Although Morse proficiency may not indicate the quality of the operator, it indicates the willingness of the operator to expend effort to attain a goal. Thus it is an indicator of a desirable character trait that will be beneficial to the Amateur Service.

In closing, I would like to ask a few questions that may be relevant should RM-10787 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-10787 does not convince me that ending Morse testing is in the best interest of the Amateur Service. I do see how it is in the best interest of the NCVEC, since it would result in an immediate increase in testing fees for their members that charge them.

I ask that RM-10787 be denied for the above reasons.

Sincerely,  
Scott Cowling  
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