

I am an Extra Class Amateur Radio Operator. I have been a licensed Amateur for over 25 years. I also am an active Volunteer Examiner with the ARRL VEC. I have filed comments with the first "round" of no-code petitions and again I am filing similar comments for the second round.. Previously, I found none of these several petitions met with my expectations of the actions the commission should follow from the decision of the World Radio Communication Conference 2003 decision to rescind the international requirement for Morse Code, however, RM-10809 from the Puerto Rico Amateur Radio League is to me a viable petition.

I have never been a strong CW operator. It was a great struggle for me to achieve the 20 WPM requirement at the time I received my Extra Class License. I must admit however, the great feeling of satisfaction and achievement has never left me! I still us CW on occasion and believe it is essential to Emergency Communications (I use it routinely in Emergency Training Drills), a vital part of the Amateur Radio Service. I submit that for emergency communications it is essential for the following reasons:

- It is an excellent weak signal mode
- Equipment is simple
- Generally power requirements can be reduced (emergency communications on batteries for instance)
- While other modes may be superior in weak signal work, they require additional sophisticated equipment (and power requirements) such as computers. CW requires a simple transceiver, key, and headphones! Less is better when deploying for emergencies!

Because I believe Morse Code is still a valid and essential mode of communication I believe that the most advanced operators in Amateur Radio should maintain at least a rudimentary ability in this area. I believe that Element 1 should remain a requirement for the receipt of the Amateur Radio Extra Class license. However, I support a portion of the elimination of Element 1 for the General Class license and elimination of Technician with Morse code endorsement.

I also, believe there is some merit to giving other amateur radio operators the opportunity for "on air" practice with Morse Code. I would not have been able to become proficient in Morse Code to the level that I did (passing the 20WPM test) without on-air practice with my father, WB2EWU. This nightly practice spring boarded me into proficiency. I therefore believe that Technician Class Operators should be granted the privileges of the Technician with Morse Code (formerly called Technician Plus). This would grant them CW privileges in the "Novice" portion of the HF bands with the accompanying power restrictions. Furthermore, they would have voice privileges on the 10 Meter band, again with the associated power restrictions. I would also suggest the authorization of digital modes in these band segments (with accompanying power restrictions). This would provide an opportunity for entry level operators to "practice" and hone their skills prior to upgrading to more advanced privileges. Furthermore, this would require little change to the newly developed Technician question pool, as the current pool covers these privileges.

I reject the wholesale elimination of the Element 1 requirement as proposed in other petitions.

As an accredited VE with the ARRL VEC, I also support more stringent requirements for VEs and VECs. RM-10809 outlines reasonable changes to the VEC system that would ensure justice and equity within the Amateur Radio VEC system.

To summarize, I believe the Commission should take the following action to satisfy the several petitions before them:

- Eliminate the requirement for Element 1 for General Class Licensees
- Immediately grant current Technician Licensees “Technician with Morse Code” privileges (by changing Part 97 to have a single Technician Class with the above noted privileges)
- Retain the Element 1 requirement for Extra Class Licensees
- Modify Current band plans to allow Data Communications in the current frequency authorizations including the power limitations for Technician Class Licensees
- Implement the changes proposed in RM-10809 regarding the VECs.

Thank you for the opportunity to comment on these petitions.

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