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Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-204B
Washington, DC 20554

Subject: Comments on RM-10809

1. Morse Code is a skill that is difficult for many technical people to perfect, however merely eliminating the Morse Code licensing requirement represents a serious policy mistake.
2. Seriously defective assumptions and data have been suggested in support of the elimination of Morse Code in Amateur Licensing, including the suggestion that the mode is obsolete because various government and military services have abandoned the mode when what they have really done is abandon HF and their new domain, often based on digital satellite technology does not support or need the skill nor in most cases is it even possible to utilize.
3. Assertions that Morse is the key to growth in Amateur Radio are equally deceptive as Amateur Radio is suffering from the same demographic trends that nearly all technical endeavors in the United States have seen since 1973. No regulation is going to change the impact of these demographic and societal trends and maintain the high quality of the Amateur Service.
4. While there is logical merit to the assertion that there may be some highly competent, technical enthusiasts who would be productive members of the Amateur Service if there was no Morse Code examination requirement, however this path already exists through the no-code Tech license, and years into its availability one would be hard pressed to find a corps of highly skilled Technician class operators to demonstrate the validity of the assertion which is now more accurately characterized as an assumption.
5. The argument against Morse Testing is therefore being defined simply by the desire for no-code activity on HF, or the merit of offering this capability to the aforementioned technically skilled practitioners we would like to welcome into the Service who have as yet failed to materialize.
6. I therefore offer the following as a course of action to the Commission instead of the proposal before us:
 - a. The Commission recognize the value of Morse as a skill and encourage its use on HF, retaining it as an option to exam elements designed specifically to support the easy entry of skilled practitioners in communications technology to the Amateur Service.

- b. Those skilled practitioners, whose alleged existence has formed the basis for the “no code” agenda for the past 30 years should have no difficulty passing an exam which focuses on their area of alleged expertise; computers, computer technology, software, binary number systems, modulation techniques, and information theory. These areas represent the leading edge of Amateur Radio Technology today.
- c. That three exam elements designed to certify computer and communications technology knowledge be offered as a substitute for the Morse Exam and HF privileges.
- d. That these exam elements be designated elements C2, C3, and C4 for Technician, General and Extra privileges respectively with one exception explained below.
- e. That the C2Exam would give Technician License holders HF privileges currently reserved for the General Class without the need for demonstrating skill in Morse Code.
- f. That the C3Exam would give General License holders HF privileges in the Advanced Class sub bands without the demonstration of Morse proficiency.
- g. That the C4Exam would give Extra Class license holders HF privileges in the non-CW Extra Class sub bands without the need for the demonstration of Morse Proficiency.
- h. That Morse tests be established, segmented and renamed as follows: M2 for 5 WPM, M3 for 13 WPM, and M4 for 20 WPM.
- i. Passing Element M2 (5 WPM) would be equivalent to passing element C2, and give the applicant who had passed Element 2 HF General Class privileges, by recognizing the skill at Morse as being equivalent and as valuable as the advanced communications technology of the C2 Exam.
- j. Passing Element M3 (13 WPM) would be equivalent to passing element C3, and give the applicant who had passed Element 3 HF Advanced Class privileges, by recognizing the skill at Morse as being equivalent and as valuable as the advanced communications technology of the C3 Exam.
- k. Passing Element M4 (20 WPM) would be equivalent to passing element C4, and give the applicant who had passed element 4 HF Extra class privileges, by recognizing the skill at Morse as being equivalent and as valuable as the advanced communications technology of the C4 Exam, and that M4 be the only way to obtain access to the Extra Class CW 25 Khz segments at the lower end of 80, 40, 20, and 15 Meters, thereby preserving a domain for the practice and advancement of the art in CW.
- l. The current license structure would therefore be changed as follows:
 - i. Technician
 - 1. Element 2 Exam
 - 2. Element C2 Exam or M2 Exam
 - ii. General Class
 - 1. Element 3 Exam
 - 2. Element C3 Exam or M3 Exam
 - iii. Extra Class

1. Element 4 Exam
 2. Element C4 Exam or M4 Exam
 3. Element M4 Required for high speed CW segment access
7. It should be evident to anyone having served in or regulated the Amateur Service for the past 35 years that any rapid change in the licensing structure can be seriously detrimental to the Amateur Service and various supporting commercial interests. Incentive licensing had this effect in the 1980's, when it drove dozens of radio companies out of business and many hams left the service and flooded the market with used radios. For this reason it is strongly suggested that it is vital that ALL parties be accommodated in the final ruling so as not to foster a mass exodus from the Amateur Service.
8. These suggested for modifications of the proposal provide for:
- a. HF Access without the need to demonstrate Morse Proficiency, the petitioners purpose in filing;
 - b. Proof of advanced knowledge of computer and communications technology in lieu of a Morse requirement for those so inclined or able, in recognition of the arguments used in support of the petition in the Amateur Community;
 - c. Retains Morse proficiency as an equal qualifier for HF access for those who may find advanced technology challenging or inappropriate in answer to those who strongly support the retention of Morse as a valuable skill and or who do not fall into the category of the targeted technically elite;
 - d. Retains the Service as a potential pool of operators who are skilled and proficient in Morse Code which because of the spectrum involved remains the premier low cost, high performance mode of communication;
 - e. Furthers international goodwill by recognizing and retaining Morse as an equal to technological skill which because of common Q Signals has historically been a language independent form of communication;
 - f. Fosters national security in a number of doomsday scenarios envisioned by the military wherein modern technology could be rendered inoperable and Morse Code fluency would be essential, as only primitive equipment might survive such an event;
 - g. Retains QRP (low power operation) using Morse Code as a reasonable alternative for the Amateur Service in highly populated areas where interference and antenna restrictions are issues of concern by ensuring that a large number of Amateurs skilled in this mode will continue to populate the bands, precluding the need for the FCC to take unilateral action against such restrictions, and precluding a mass exodus from the Service as the alternative;
 - h. Encourages QRP (low power operation) for portable stations on the HF bands, permitting this small but rapidly growing segment of the Service to continue to develop technology and products specific to this activity. This activity is essential to the ability of the Service to respond in severe emergency situations. As an example of this technology, the direction, and the capability it provides the public, I point the Commission to the products developed by Elecraft (KX1, K1, K2) , Tentec, Icom (IC-703),

LDG Electronics, MFJ, North Country Radio, Oak Hills Research, Wilderness Radio and nearly 40 others by ensuring that the skillset required to make these advancements operationally attractive remains widely available in the service.

- i. Encourages the development of “Super Stations” through the continued support of Morse in general, said “Super Stations” being those typically operational during CW Contesting, and supports the industry, both domestic and foreign that caters to this segment including but not limited to ICOM, Tentec, Kenwood, Yaesu, Elecraft, Alpha Industries, Command Technologies and nearly 20 others.
 - j. Retains in the Amateur Service the mechanical engineering talent currently focused on the development of keys and keying devices, said talent being essential as a springboard to new services and missions for the Amateur Service in the future.
 - k. Maintains a market for Morse Training companies and publishers that support the service who can hardly sustain any decrease in revenues, even if they may benefit from slowing increasing numbers of Amateurs due to the changes. The effect of any other course of action being wholly conjecture, a rapid decrease in revenue could prove fatal to essential enterprises in many areas.
 - l. Continues the market for high performance equipment required by Morse operators and incentivizes the development and advancement of DSP and other narrow band technology in support of this mode.
 - m. Retains for future generations an extremely narrow band mode that may someday be required as the major populations of the world become free and as their societies open. For example, should China become a free nation, the number of hams in the world would so dramatically increase that CW would be one of the only modes of non-machine communication capable of handling the load in the spectrum currently reserved for the Amateur Service.
 - n. Codifies for our posterity the contribution made by Samuel Morse and others to the human condition, and provides a recognized connection between the past, its entrepreneurs, scientists, and practitioners and the present in a meaningful way that supports the nostalgia, connection with history, and record that is essential for the preservation of any society. To that end we preserve buildings, bridges, and battle sites. Morse is no less deserving of a place in our national heritage, and no less in need of preservation.
9. It is therefore suggested that the issue of the retention of Morse in the Amateur Service has wide ranging implications, both commercially and operationally. I strongly urge the Commission to consider the ramifications of Morse Code elimination and to reject it in its entirety, answering instead the claims of no-code proponents through the addition of testing paths that recognize their assertions while keeping the Morse continent alive and well by restoring Morse testing to its rightful place in the Amateur Service.

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