

I have been a licensed Amateur Radio Operator for 48 years, getting my Novice in January 1955 and earning my Amateur Extra in 1977. I became a VE in 1984. Further, I worked in electronics for 20 years and am now a Professor Emeritus, having retired from a major community college district after twenty years. I am neither an engineer nor attorney, as many of the writers of petitions and comments seem to be. Still, this background gives me good insight into the level of knowledge needed to function on technical and communications planes.

I speak only for myself, not for any amateur related organizations that I belong to; nor do they speak for me.

My opinion of RM-10807 is that it would give instant upgrades to over 54 percent of the 683,430 amateur radio operators, based on the October 28 FCC data:

32,936 Novices would become equivalent to Technician Plus	4.785%
257,759 Technicians would become equivalent to Technician Plus	37.715%
82,458 Advanced would become Amateur Extra	<u>12.006%</u>
	54.506%

Therefore, this effectively disenfranchises some 45.5% of all licensees.

I would further parenthetically note that there are no footnotes or references to data presented.

The writers should be complimented on writing a very well researched, time consuming and thoughtful petition, which does present some interesting possibilities regarding the testing mechanisms for each class of license that would remain and also would require upgrades to be dependent on time as a licensed amateur radio operator.

My specific comments:

1. Introduction

Paragraph 1 sub 1 This is keeping with the FCC's minimal class concept

Paragraph 2 Shows good intentions

Paragraph 3 Mirrors Part 97.1 (b) & (c)

2. Background and Discussion

2.1 Consolidation of License Classes

Paragraph 1,2 Very interesting data and generally corresponds to my thoughts

- Paragraph 3 It has been said that the old Element 4 A was much harder than 4B
- Paragraph 4 Therefore, an NPRM is mandatory, not as other petitioners have tried to state many times
- Paragraph 5 I disagree that the Novice has been “orphaned”. Holders passed Element 1A (now Element 1) and have only to pass Element 2 to upgrade to Technician Plus, Element 3 to get General and Element 4 to attain the Extra
- Paragraph 6 Where is the data?
- 2.2 Frequency and Mode Privilege reallocation
- Paragraph 2 Where is the data?
- Paragraph 4 Well put
- 2.3 Examination Requirements
- Paragraph 1 I feel that the NCVEC has been accorded power without being responsible to any other amateur organization
- Paragraph 2 Do we see concerted attempts to gain knowledge, or are we content to learn the questions and then maintain the status quo?
- Paragraph 3 Somehow, answering 90 of 120 memorized questions and copying 25 straight characters does not an expert make. Are we following the letter or the spirit of the law?
- Paragraph 4, 5 We are part of the ITU but retain the right to test as we determine to be appropriate
- Paragraph 6 How would “technical competence” be accurately determined? I would like to see some “hands-on” testing: work out Ohm’s/Watt’s Law and other math problems, fill-in questions, oral portions of the test (like the FAA), solder or assemble circuits and coaxial connectors, build and test a simple antenna to a given frequency, identify common components. The list goes on...
- Paragraph 7 I concur with more comprehensive exams. See above
- Paragraph 8, 9, 10 I am very glad that they included this Attachment

Paragraph 11 As in other petitions, “burden” appears. I feel it has to be a self-defined term. Much of the burden comes from retesting unprepared candidates. Parenthetically, what is the national pass/fail ratio? Perhaps the NCVEC could tell us

3. Scope of Proposals

3.1 Consolidation of license classes

3.1.1, 3.1.2 I oppose the automatic upgrade without valid written testing. Perhaps the Novice could upgrade with a 15 to 20 question test that bridges the gap; the same could be done for the Advanced

3.2 Frequency, Power, and Mode privilege reallocation

I concur, if this petition is adopted

3.3 Examination Requirements

3.3.1 If a candidate for Extra failed all code testing, it would appear that that person, as a VE, could give code elements

3.3.2 I concur

3.3.3 An admirable set of research! They have captured the prevailing issues of today’s testing, especially in paragraphs 5 and 6

3.3.4

Paragraph 1 I concur

Paragraph 2,3 This is a novel approach to the issue, but still permits an Extra to bypass the code entirely

3.3.6 If implemented, it’s pretty much an even trade

3.3.7

Paragraph 1, Sentence 1 Please state you analysis methodology

Paragraphs 2, 3,4 These present a novel approach; however, a skilled memorizer could still pass and become licensed

4. Specific Proposals

Generally, no comment, since this is naturally predicated on having this petition become law. However, in 4.1.7, I believe the petitioners meant 47CFR97.303(s) instead of the given citation .307.

4.3.1

An excellent idea, which I have heard from many other amateurs. This has historical precedent in the old Class B to A upgrade and also in 1952, when the Extra first became available. But would it be mandatory that the code and written sections be taken at the same sitting, since it is one test? It would also eliminate the "Last week, I couldn't spell Extruh, now I are one" syndrome that we hear. There is much to be said about taking the time to learn. And, we all Need time to let it soak in.

4.3.4

Reference .507(a), code testing could be done by a General or Extra who has not passed the code part

Reference .507(a)(1), I would like to see the code test expanded to 10 minutes and include abbreviations and Q signals, thus more closely resembling a real QSO. The standard would be one minute of solid copy

Reference .507(b)(2), would a General be able to test General candidates?

5. Summary Paragraph 2

As mentioned before, 54% will be automatically upgraded, while 46% are disenfranchised.

Therefore, I would generally support this RM, except for reasons stated above.

Thank you for reading and considering my view on this Rulemaking.

Richard T. Martin, N6ZQ
11218 NE 12th Avenue
Vancouver WA 98685-4008
n6zq@arrl.net