

Comment Re: RM-10805 thru RM-10811

It is important to remember that Citizens Band Radio was an earlier attempt at creating a Morse Code free “Amateur Radio like” service. Experience has shown that those that are attracted to such a relatively effortless license are those that have little respect for FCC rules and regulations with regard to proper licensing, power levels, band width limitations, band edge limitations, interference with other services, transmitting false and deceptive signals, profanity, etc.

Removing the Morse requirement will inundate the Amateur Radio service with millions of untrained, disrespectful, uncaring non-operators which will create a market for cheap import high frequency radios which will be snapped up by every truck driver, teen aged miscreant, drug dealer and even possible terrorist across the country. In the minds of the public, the new Amateur Radio service will be just a new and improved, expanded Citizen’s Band. Inevitably these new radios will be “tweaked” and “fixed” so that they can operate at higher power levels, greater modulation levels and will lead to an overwhelming enforcement problem on a global scale.

The interference will be so great that more and more operators will be coaxed out of the band and will render unuseable a great deal of the HF spectrum. This will insure disaster in an emergency as not only will real Radio Amateurs be unable to communicate, but government, FEMA, military and other emergency services will be treated as just an annoyance and shouted down on any frequency convenient for the use of the newly authorized “Ham.” The FCC does not have the budget or the manpower to police the inevitable debacle.

As an Amateur Radio Operator of some 45+ years standing, I request that in your consideration of the above requests for rule making you consider Part 97.1 of your own rules and regulations.

The basis and purpose of the Amateur Radio Service states quite clearly that the service is not an entitlement. Part 97.1(a) states that it is: “a **voluntary**, noncommercial communications service, particularly with respect to emergency communications.” It is **not** just another mode or means of communication that is or has ever been available to the general public. To participate in Amateur Radio one must **voluntarily** meet the requirements for licensing. For casual communications there are innumerable alternative channels.

The Morse code requirement is neither punitive nor discriminatory. It is not equivalent to learning a new language with thousands of words to retain but rather to relearning the alphabet. Mastering 26 new sounds for the letters and 10 new sounds for the numbers from zero thru nine is certainly not an insurmountable obstacle. It has been accomplished by the very young, the very old and the disabled alike. It **is** of primary importance in gauging the desire and determination of the applicant to fulfill the basis and purpose of the Amateur Radio Service as laid out in Part 97.1.

As an Amateur I count on the skills and abilities of my fellow Hams in an emergency (**Part 97.1[a]**) and the development of new antennas, feed-lines, signal generating methods, etc. (**Part 97.1[b]**).

Many of these activities take place in a non-voice, non-computer data environment where Morse is convenient and economical. Amateur Radio is a technical pursuit (*Part 97.1[c]*), the goal of which is *often not* just idle conversation. The service will suffer greatly from dropping the simple requirement of learning 36 new sounds.

The rules (*Part 97.1[c, d]*) *require* the expansion of the reservoir of “skilled” and “trained” operators. Lowering any of the present requirements would be to place Amateur Radio applicants in the same classification as the ordinary citizen. Amateur Radio has never been just a means of communication. It is a highly technical pursuit.

As for international good will (*Part 97.1[e]*), the example set by Citizen’s Band operators of hurling racial and religious slurs across town is a clear indication that the wholesale licensing of lazy, unmotivated people will result in complete chaos when their reach is extended.

In conclusion, much is made of the actions of other nations and international organizations to drop the requirement for Morse. The United States of America has never been a follower in international affairs. Change for the sake of change or blindly following the lead of others is not the American way. We should proudly maintain the requirements which have brought honor to Radio Amateurs and the Amateur Service.

Indeed, Morse should be a requirement for all emergency workers and “first responders” as the simple sounds of tapping or scrapping out a Morse message may mean the difference between life and death in rubble as we have seen in the first part of this century. It is not time to take a step backward in our skills and abilities. We should aspire to greater efficiency and mastery of the basic skills upon which we can build even greater accomplishments.

Any action on the part of the FCC to remove the Morse requirement will result in the destruction of the service as it has been since its inception and create an unmanageable chaos. The genie will not be easily placed back in the bottle. Simply put, dropping the Morse requirement would be a blatant violation of public trust.

Thank you for your consideration,

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