To: Federal Communications Commission
Washington, D.C.

Re: RM-10811

Members of the Commission:

This comment is written in support of the above referenced petition which urges the retention of a requirement for the demonstration of a proficiency in International Morse Code for high frequency operating privileges in the Amateur Radio Service. Commensurate with that support, the rejection of those other pending petitions which seek elimination of a Morse proficiency test is urged.

The Commission is urged to recognize what is certainly the single most important function of the Morse proficiency test. As has been argued by the Petitioner, continuous wave communication (CW) using International Morse Code provides a simple, common denominator insuring that in local, regional, national and potentially international crises, there will be a trained corps of personnel who will be capable of providing public service communications in an efficient, prompt and effective manner under circumstances in which the other communications modes either fail or are not satisfactorily reliable.

Under this Commission's regulations, the Amateur Radio Service exists to perform a public service. The retention of the Morse proficiency requirement serves the public interest, convenience and necessity by establishing a highly trained corps of individuals who are known to be capable of communicating in the simplest mode, and in the mode which is most likely to be effective in adverse circumstances. The elimination of the Morse proficiency requirement weakens the ability of the Amateur Radio Service to be prepared to effectively serve the public under those adverse conditions. If left to individual choice, the numbers of amateur operators who have proficiency in Morse code may drop dramatically, with the resultant loss of assurance to the public that emergency communications can be maintained when those communications may mean the difference between life and death, or between chaos and public safety.

The Petitioner in RM-10811 has articulated many of the reasons for distinguishing the effectiveness of Morse communications from other modes of communication. The supporting comments from Michigan Net, QMN, Inc. also set forth a well articulated basis for rejecting the arguments of those who urge the Commission to eliminate the Morse

proficiency requirement because of its disappearance from other radio services.

What remains is the fundamental requisite that the Amateur Radio Service be structured to enable the public to be assured that Amateur Radio operators are equipped to provide communications services that may make the difference between life and death when all other systems have failed.

Respectfully submitted,

John L. Swartz, WA9AQN
Route 3, Box 276 G
Petersburg, IL 62675