

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-10805 is that it show good thought and some parts could be used as a model for updating Part 97.

Preamble

Paragraph 2 Since the Technician Class is the largest class (at 37.7 %) the automatic upgrading stated will overstress the limited voice frequencies currently permitted and cause an almost instant uproar for more frequencies.

Both classes of Technician now account for 46.3 % of total licensed operators.

I Introduction and Background

Paragraph 1 I refer the reader to RM-10807 Appendix A for more details.

Paragraphs 2, 3 and 4 contain interesting concepts.

II WARC 2003

No comment

III Balancing the Opportunity...

Paragraph 2 Barriers are many times self imposed.

Paragraph 3 HandiHams does an admirable job regarding those with disabilities.

Paragraph 4 May the Commission never forget...

IV Summary

Paragraph 1 Well summarizes current stumbling blocks to revising Part 97

Paragraph 3 Leaving all other classes unchanged is a good idea.

Paragraph 4 Item 2 This would mean that the Technician Plus is now a Codeless Low-Power General, having only to pass Element 1 for full privileges. This could greatly increase upgrading, which is the intent of the petition. I believe he omitted the 12 Meter band, since it is also narrow.

Paragraph 5 Perhaps a 5 year license for new licensees and upgrades would be appropriate, since it would somewhat track their enthusiasm and thus not inflate license counts with inactive operators.

Paragraph 6 The effect on the FCC would be minimal.

V combination

No comment.

Closing

Well stated, since the Commission should be made fully aware of the “grass roots” response by individual hams and they should have equal footing with large, verbose organizations.

Therefore, I would generally support this RM.

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

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