

RE: Proposed RM-10867, RM-10868, RM-10869, and RM-10870

I serve as a County Emergency Manager, have a solid electronics background, and even worked in the commercial broadcast industry for nearly 25 years.

I recall the days when at age 15, I passed the broadcast endorsed tests to operate a 100,000 watt commercial FM broadcast facility, but at age 16 was denied a 4 watt citizens band radio operating permit... because I was not old enough.

The point in mentioning this is that times change. It might take the FCC a couple of years to go through the process and play catch up, but that does indeed need to be done when it comes to restructuring license classes \ operating privileges in amateur radio.

Currently, I hold a technician class, but do not have a desire to learn code to advance. I doubt I could pass the code due to my having a hearing deficiency in which it is hard for me to distinguish tones. With this limitation, I must ask if it is justified to continue to maintain archaic rules that prevent myself from advancing and enjoying operation on other spectrums?

Each Petition for Rule Making is an obvious response to the World Radio Communication Conference action that made changes to Article 25 of the international Radio Regulations.

Of the proposals, both RM-10867 (ARRL) and RM-10868 (RAF) each have merit and are logical in their approach, but elements of both could be blended into one.

Specifically, that should include the following:

1. Adopt RM-10867 as is, however...
2. Require some changes in the availability of question pools.
If question pools must be released in the public domain, at least supply the question, answer, and the RATIONALE. That is, an explanation as to WHY the answer is a, b, c, or d. Perhaps those taking the memorization route will take time to also read the rationale.
3. Adopt the waiting period for testing as proposed in RM-10868
4. Adopt the vanity call sign change as proposed in RM-10868.
Hopefully, new operators could be easily identified as a result, and experienced operators would (should) Elmer such individuals.
5. Permit digital experimentation from 29.0 to 29.3 MHz at bandwidths of up to 15 kHz.

As far as RM-10869 (Lowrance), I feel that apart from my personal limitations mentioned earlier, this proposal would in effect have a continued restrictive effect on the hobby. I might further add, from an emergency management standpoint, code might be more reliable, but the number of individuals using it is dwindling as evidenced by the number of technicians who have obviously chosen

to not advance to higher classes of licenses. Therefore, I consider the more reliable argument to be somewhat a moot point.

Of RM-10870 (NCVEC), I think a 3 tier licensing structure as proposed in RM-10867, and restructuring of code requirement in Advanced Extra adequately addresses "most reliable" and a desire to "preserve the heritage" arguments of the hobby, thus to totally eliminate code as proposed in RM-10870 would be counterproductive to those elements and would not serve as a good compromise. Although the thought of requiring use of commercially built equipment to access certain parts of the spectrum is a good thought, enforcement of such would be a nightmare, and subject to much speculation.

In conclusion, I think taking a good share of RM-10867 and parts of RM-10868 as noted will achieve a goal for enhancing the hobby, and serving as good compromise for all. But change to a less restrictive approach is indeed necessary.

Bruce R. Wozniak