

KN4AQ Comments on RM-10867, ARRL Proposal for Amateur Radio restructuring

I have been an Amateur Radio operator since 1965, and currently hold an Amateur Extra Class license. During most of that time, I have leaned toward VHF/UHF FM operation, and I am currently the editor of the *SERA Repeater Journal*, a magazine published for FM repeater owners and users, and I am the FM columnist for *CQ VHF* magazine. I have also taught license classes for the past 10 years. I believe I am acutely aware of the difficulties and limitations of the current license structure, particularly the Technician license as the “entry level” license.

I support the ARRL proposal. The current 3+(2) structure of license classes and privileges is unnecessarily complex. While simplifying it will create some short-term confusion, it will help the Amateur Radio Service transition to the future.

Morse code has passed its usefulness as a gateway element in the Amateur Radio licensing process. It does not assure higher quality operators, evidenced by the number of “problem” amateurs of higher license classes. It blocks entry of potentially valuable members of our service. And its elimination for the Technician Class license in 1991 did not flood the service with poorly trained and badly motivated hams. I have met many new no-code amateurs who have been a tremendous asset, and who waited for the advent of the no-code license to become licensed hams.

The most compelling argument for retaining the Morse requirement – that it is the best mode for passing urgent communications under adverse conditions using simple equipment – is true. However, it is mitigated by fact that the requirement does *not* result in a large cadre of volunteers using cw to handle emergency communications. The real result is a *lack* of operators being available to handle HF communications using *any* mode. The usefulness of the large influx of eager Technician Class hams has been limited by their inability to operate on the HF bands. We have had a particular problem staffing the North Carolina State EOC Amateur Radio station during disasters, as our most enthusiastic and available volunteers tend to be newer Technician Class hams.

In addition, in my 14 years of experience working with emergency communications through North Carolina Emergency Management and the Amateur Radio Emergency Service, I have seen very few times when operators on the HF networks resorted to cw to complete communications. There were times when they could have, and perhaps should have, but generally they did not. The requirement to learn the code for licensing did not guarantee that the skills were still available when they might have been useful. An enforced requirement that the skills be maintained would effectively eliminate many of the few volunteers who actually participate in emergency communications. Those remaining would not be numerous enough to handle the task.

I favor eliminating the Morse requirement for the Amateur Extra Class license as well, but I also see some value in retaining a vestige of this important part of our history and

culture for those who wish to achieve the highest-class license with its limited additional privileges.

The Technician license is a poor entry-level vehicle for new hams. VHF/UHF FM communication, which most Technician class hams limit themselves to, is valuable and enjoyable, and many hams with higher-class licenses make this their primary or only Amateur Radio mode of operation. However, it does not serve the amateur service well to have an entrenched class division based on spectrum privileges, with the entry-level class getting no HF privileges. Technicians operating on VHF-UHF FM do learn good operating practices, but HF operation requires additional skills and understanding, and VHF/UHF FM operation provides no training for those skills. It makes sense to have a limited set of the full range of spectrum and mode options available in the entry-level license.

Automatic license class upgrades for Technician and Advance Class licensees are only slightly behind the elimination of the Morse code requirement in generating controversy in the amateur community. I just said that Technicians are not prepared for HF operation, and this proposal would usher them into nearly full HF privileges with no additional testing or mandatory instruction. There is less heartburn promoting Advanced Class hams to Extra Class, as they have already have the operating skills, and have passed the more difficult exam elements and a higher speed Morse test than currently required.

All the proposals I've seen for addressing this difficulty result in another complex scheme of license class and privileges. I expect that there will be a period of adjustment when current Technicians are promoted to General Class. Some will jump into HF without learning enough about it. But they will bring VHF-FM Amateur Radio skills and practices with them that, while not totally appropriate to HF operation, are nonetheless based on respect and understanding for our service and spectrum. It will be up to those with more experience, our peers, clubs, magazines and the ARRL, to show them what procedures are more appropriate for the HF spectrum.

I feel compelled to note that there have been more than a few hams trained only in HF operation who arrived in the world of FM and repeaters, bewildered and poorly prepared for *that* experience. We did not ask them to go back and retake the Technician Class exam.

In conclusion, there are an infinite number of ways the Amateur Radio service could be restructured, and I expect my fellow hams will recommend them all. The ARRL proposal is simple, and serves the needs of the amateur community. It will work.