

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**In the Matter of** )  
 )  
**Changes to Part 97 With** ) **RM-10869**  
**Regard to Amateur Radio Service** )  
**Rules, Element 1** )

**Via the ECFS**

**COMMENTS on the Petition of Ronald D. Lowrance  
by Leonard H. Anderson**

I wish to thank the Commission for providing a forum for commentary by all citizens. Please allow me to state that I am a retired electronics design engineer with no vested interest in any professional or amateur radio activity or educational institution nor with any of those who have commented on this petition or Rule Making. All of the following comments are those of a private citizen fortunate to experience a half century in the radio-electronics industry and military of the United States, that including radio communications..

**On The 18 Petitions For Part 97 Amendment in 2003 - 2004**

Of the 14 Petitions for Rule Making released for comments in 2003 (now closed), plus the 4 released in 2004, it is observable that there is no unity among the petitioners about changes to the United States Amateur Radio Regulations. That fits with casual observation away from any rule making venues.

The National Council of Volunteer Examiner Coordinators (NCVEC) have taken a more realistic look at both the present and near future in United States Amateur Radio, not only in their viewpoint on International Morse Code examination testing but the interrelationship of Amateur regulations. While the NCVEC could be accused of bias towards only the examination process, their petition shows considerable thought and the background of many in the Volunteer Examiner Coordinator (VEC) licensees with first-hand observation of those taking examinations. The VEC are also relatively long-term Amateur Radio licensees and, from casual observation of their database information, have all been required to pass an International Morse Code examination at rates faster than the existing 5 words per minute regulation minimum .

While I would personally favor the NCVEC petition, I will make some comments and observations relative to Petition for Rule Making RM-10869 [RAF] following.

**A. Proficiency in Morse Code is a Key Element for National Security**

Mr. Lowrance states that “...*proficiency in Morse Code (CW) for Amateurs is a Key component of communications for our community service responsibilities under and within Department of Homeland Security (DHS).*” Mr. Lowrance is requested to supply the cites for this claim in that it is not visible to public

searches on the Internet and not yet incorporated into any Part of Title 47, C.F.R.

The claim seems fabricated in that **no** civil public safety agencies, **no** United States military branches use any manual telegraphy for communications. **No** civil aviation facility uses manual telegraphy for communications. Manual telegraphy is **not** used in the telephone infrastructure, Internet, broadcasting services, common carrier services, civil boat communications or any sub-part of the Private Land Mobile Radio Service. That was the case on 10 September 2001, the day before the infamous Attack on America in New York City and Washington, DC. That was the case on 12 September 2001, the day after the Attack, when the existing capabilities of the government, military, and civil public safety agencies handled the all the necessary communications on the immediate Attack aftermath. There is **no** logical validity to any claims that manual telegraphy by radio amateurs could have warned anyone or handled immediate emergency communications.

## **B. The Myth of “CW Gets Through When Nothing Else Will”**

Mr. Lowrance states “*The Amateur’s ability to transmit messages during difficult atmospheric and man-made conditions will be critical when other operators not capable of transmitting and copying CW when voice and digital modes fail.*” That myth has been explained in detail in other Comments made on the 18 Petitions for Rule Making during 2003 - 2004.<sup>1</sup> If that was true then the entirety of the United States military, governments, and public safety agencies must adapt to it. It isn’t true. Neither is it true that some catastrophic event will destroy our non-amateur communications infrastructure leaving only radio amateurs and their supposedly indestructible communications equipment in working order. Regulations cannot be changed on the whims of pipe dream imaginary scenarios.

## **C. Alleged Historical Precedent of Leadership Through Amateur Radiotelegraphy**

Mr. Lowrance states, “*The Amateur Radio community has the unique opportunity again to write into history, just as our predecessors did during WWI and WWII, and once again establish Amateur Radio as a Key component of our national security system.*” World War One ended 86 years ago. Amateur Radio activities were curtailed for that duration, restored 1919. World War Two ended 59 years ago. Amateur Radio activities were curtailed for that duration. Amateur Radio had **no** direct relation in the Allies winning either conflict. Amateur Radio has **no** direct relation to the United States winning or losing any conflicts in Korea, Vietnam, the peacekeeping missions to the Sinai and Lebanon, nor in Panama, Grenada, Kuwait, Somalia, the republics of former Yugoslavia, or Afghanistan. Amateur Radio did not alert anyone of the infamous Attack on America of 11 September 2004. Where was this alleged “*leadership*” that Mr. Lowrance claims?

At the end of World War One, few vacuum tubes were available for use by radio amateurs. The chaos of the rapidly expanding then-new technology forced radio amateurs to operate in the as-yet uncharted and little-used Electromagnetic spectrum above 1.5 MHz. At the end of World War Two, the transistor had yet to be invented and radio amateurs had switched to vacuum tube based radios. Undamped RF oscillation such as *Spark transmitters* had been prohibited prior to the United States involvement in World War 2. The United States led the Allies in producing vast quantities of electronics and communications equipment plus quartz crystal units during the second world war. The United States also perfected mobile and portable Frequency Modulation radios, radio relay terminals handling many different modes, radar equipment, radio navigation

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<sup>1</sup> That myth and its falsity has been detailed in my Comments to the Radio Amateur Foundation’s Petition for Rule Making RM-10868 dated 30 March 2004.

systems, aviation systems. There was no evidence of “*leadership*” through any form of manual telegraphy after the Second World War. The military and commercial radio services began using *teleprinter* telegraphy en masse after, had already begun that changeover prior to the start of that war.

There is no “*leadership*” in maintaining old standards and practices of the beginnings of radio 108 years ago. There is no “*leadership*” nor any state-of-the-art increase in manual telegraphy that began 160 years ago. There is no “*leadership*” in satisfying the wishes of a minority group in a radio avocation having pipe dreams of imaginary honor and glory about amateur radiotelegraphy.

The United States of America can begin to return to a place of *leadership* in international Amateur Radio by being progressive with modern regulations which are up to date, reflecting the wishes of all, not a coterie of old-time hobbyists vainly trying to recapture their youth. The Commission can give radio amateurs the option of flexible, modern regulations. Option is not a failure.

I thank the Commission for allowing an independent citizen’s viewpoint to be heard and with the ability to share a half century’s accumulation of experience and knowledge in radio and electronics at work and in hobby activities.

Respectfully submitted electronically this 30<sup>th</sup> day of March, 2004,

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