

Since WRC's decision last July to remove the mandate for Morse proficiency testing by international treaty, eighteen proposals have been submitted to the Commission calling for the modification of existing licensing structure for the Amateur Radio Service. I was one of six amateurs who contributed to authoring the Radio Amateur Foundation Proposal, RM-10868. Although I fully support RM-10868 as written, I have some ideas that might make it more viable. I will address this issue shortly.

Since the WRC decision, the pro-code vs. no-code dispute has intensified to the point where both camps are at each other's throats. Such bitterness and resentment is counterproductive to amateur radio. This dispute has nothing to do with Morse code, as the no-coders claim. Neither does it have to do with license class, which they also claim. It has to do with compromising and eroding standards. For at least the past two decades, the trend has been to lower the standards for obtaining an amateur license in the name of increasing the amount of licensed hams and revitalizing the amateur service. Every effort along these lines has failed to yield the intended result. I personally see no reason why lowering the bar any further will yield the intended result of increasing the number of licensed amateurs.

Among the four current proposals that are open for comment, RM-10867 and RM-10870 call for eliminating the Morse proficiency requirement and granting higher privileges to the Technician class, by eliminating the Technician class and automatically upgrading more than a quarter million Technicians to the General class without any further testing and without any further work. Both RM-10867 and RM-10870 call for the creation of a new entry-level license class to replace the Technician class. The exam for the new proposed class of license (RM-10867 calls it "Novice", while RM-10870 calls it "Communicator") would reduce the number of questions from 35 down to 25 for RM-10867 and 20 for RM-10870. Undoubtedly, the testing reduction would consequently reduce the level of technical content that an applicant must know to be granted an entry-level license in the amateur service. Also, the amount of HF privileges offered to the new proposed entry-level license by RM-10867 and RM-10870 is far too liberal. The liberal privileges offered to those entering the amateur service, along with the wholesale giveaway of privileges granted to existing Technician class licensees removes most, if not all incentive to work toward an upgrade.

Lowering licensing standards and granting free upgrades to those who didn't put forth any work to learn new material and take an exam to demonstrate learning new material will serve to adversely affect the amateur service by lowering the competency level and the level of technical knowledge of those who are licensed in the amateur service, and only breed more intensified bitterness and resentment among hams. The schism between those who worked hard for their privileges and put forth the effort to learn new skills and obtain more technical knowledge vs. those who were either granted a free upgrade or had to demonstrate far less knowledge for the same privileges will only become wider, and the divisions will become only more intensified. All this is extremely counterproductive to the amateur service.

RM-10870's Communicator class license restricts the licensee to commercially built equipment and only commercial kits. The licensee is not free to tinker, experiment, build or modify his/her own equipment. This is contradictory to the spirit of amateur radio, where an amateur is encouraged to build, modify and experiment with his/her equipment. It hinders the entry-level amateur from learning, for it is through tinkering, modifying, experimenting and building that an amateur learns and develops new concepts and technologies. I ask the Commission not to allow those entering the amateur service be stifled from

learning. Might I remind the Commission that the Novices of past decades were not denied the privilege of building their own equipment, the privilege to modify, tinker and experiment either. A radio amateur is forever learning, beginning with the entry point and all throughout the time that the amateur is involved with amateur radio.

I feel that the existing Radio Amateur Foundation proposal, RM-10868 can be made more viable by adopting a dual option for obtaining the General class license. The option would be decided when the applicant submits his/her application at the test session. Under Option 1, the applicant would have to pass Elements 1 and 3 as proposed by RM-10868. Under Option 2, the applicant would have to pass a more rigid and comprehensive Element 3A exam with no code test. With this dual option system, applicants for General would not be compelled to learn Morse code and take a code test. This system would have the effect of making the General class license available to those who either don't wish to learn code, or argue that they are incapable of learning code due to disability, without compromising standards. The more comprehensive and rigid Element 3A exam would ensure that the applicant put forth an amount of work for the license equal to that which their counterparts put forth, which is the work to learn an additional skill (Morse code).

Another alternative is to eliminate code testing for General completely and just go to the more comprehensive and in-depth Element 3A exam for all applicants. Either way, standards for amateur radio licensing would not be compromised.

I believe very firmly that amateur radio licenses need to be worked for and earned by those wishing to obtain them. One who works for the license will respect and cherish their amateur privileges more than one who does little or no work to obtain the license and the privileges that the license grants.

I fear that the kind of wholesale giveaway and reduction of standards that RM-10867 and RM-10870 propose will cause the deterioration of the amateur service not unlike what resulted with the Citizen's Radio Service. Because HF amateur radio propagates worldwide, turning the amateur bands into a free-for-all with overcrowded band conditions and interference will be adversely felt around the world. The United States has one of the largest amateur radio populations in the world. A blanket upgrade for 250,000 to 350,000 Technician class licensees to the General class would result in chaos on the HF amateur bands.

I ask the Commission not to consider RM-10867 or RM-10870 for license restructuring. I ask the Commission to seriously consider RM-10868 (Radio Amateur Foundation proposal), along with the dual option revision that I suggested in this comment.

If the Commission feels compelled to eliminate Morse proficiency testing for all classes of license, I ask that the Commission uphold standards in amateur radio licensing by at least making the exams more comprehensive, so that an applicant will have to work for his/her license and learn something in the process. There is little or no work involved in passing the current exams (see original text of RM-10868). If code testing is eliminated, something needs to be put in its place, so that a license is earned, and so that the applicant leaves the test session with a feeling of accomplishment, and a feeling that he/she has learned something. The something that would replace code testing needs to be a more comprehensive written exam on technical theory, rules/regs and operating procedure.

The World Radiocommunication Conference vote doesn't compel any nation to eliminate Morse code proficiency testing. The decision to either retain or eliminate Morse code proficiency testing is now left to each individual nation. The Commission's decision on this matter should not be based on popular opinion (the opinion of those who do not wish to learn Morse code), or the decisions of other countries. The Commission's decision should be based on what is best for the Amateur Radio Service here in the United States. Great Britain was one of the first countries to eliminate Morse testing after the WRC ruling, but Great Britain also has one of the most rigid and comprehensive systems in the world for testing and licensing for their amateurs. Great Britain did not lower standards by the elimination of Morse testing. If the United States eliminates Morse testing without replacing it with more rigid and comprehensive written exams, we will be lowering our standards.

As is mentioned in the text of RM-10868, it is important to discontinue the published question pools to prevent memorization of questions and answers. There is no school system that provides students with published question pools. It would be impossible to imagine high schools and colleges making questions and answers available to students before exams. There is no reason why amateur radio exams should be any different.

Thank you.

Respectfully Yours,

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