

Federal Communications Commission
Washington, D.C.

Subject: *Petition for Rule Making* (RM-10867) by the ARRL

Dear Commissioners:

I have been an amateur radio operator since 1968, an Amateur Extra class licensee since 1970, and a volunteer examiner since 1984. My early interest in amateur radio motivated me, as it has many other licensees, to pursue a career in electrical engineering. I very much want the Amateur Radio Service to remain a vibrant institution consisting of “trained operators, technicians, and electronics experts” as stated in Part 97.1 of the Commission’s regulations.

In its petition (RM-10867) the Board of Directors of the American Radio Relay League (ARRL) has tried to strike a balance between conflicting viewpoints. Although significantly better than the petition submitted by the National Conference of Volunteer Examiner Coordinators (NCVEC), the ARRL plan recommends some changes to the Amateur Radio Service that are unwise and unnecessary at this time.

For example, the ARRL proposes that the Commission develop a new entry-level license that would grant some HF privileges, including radiotelephony, but requiring no Morse code examination. Rather than create a new license class, however, it would be much simpler for the Commission to modify the current Technician class license as proposed in petition RM-10868 filed by the Radio Amateur Foundation.

A major weakness of the ARRL plan is its recommendation to eliminate the Morse code test now required of all General class applicants. The ARRL presents no compelling reason for this specific recommendation. Anyone having a modicum of motivation for the increased operating privileges conveyed by the General class license will suffer no significant hardship in satisfying the 5 WPM Morse testing requirement as currently required for all General class applicants. Even with the powerful digital modes now available to the amateur, the uniqueness of Morse justifies its continued special status by the Commission as an examination element for the higher grades of license. No one can question that those amateurs with at least a minimum proficiency in radiotelegraphy have a distinct advantage over those amateurs with no code proficiency whatsoever.

Entry-level licensees will have ample opportunities to gain on-the-air Morse proficiency if they so choose. Some of these entry-level licensees, for one or more reasons, will be content to operate within their limited privileges and will never seek a higher class of license. However, the future growth of the Amateur

Radio Service will not be unduly hampered if the minimal Morse code examination now required for the General class license is retained.

I have spent a major part of my operating time on HF public service nets that focus on the transmission of formal messages. These so-called traffic nets offer amateur radio operators significant training opportunities in emergency communications. I operate on both SSB and Morse code nets; many times I have directly experienced the tremendous advantage of telegraphy over telephony under less-than-optimum propagation conditions. Relatively simple equipment operating at low power levels will almost always get the message through in a timely manner when using the code; no other mode has this unique capability. I believe that a minimum proficiency in Morse code should remain a basic skill possessed by all General (and Amateur Extra) class operators because of the continuing importance of amateur radio in providing backup emergency communications to governments at the local, state, and national levels, along with served agencies such as the American Red Cross and the Salvation Army.

It is generally accepted that students are not capable of determining the particular academic topics that should and should not be included in a specific discipline. As a college teacher, I firmly believe in this principle. As an experienced amateur radio operator, I also believe this principle applies in the present debate on Morse testing; that is, I submit that applicants with no experience in radiotelegraphy are in no position to argue that General class operators should be excused from demonstrating code proficiency. Moreover, I firmly believe that the majority of respondents in favor of eliminating the Morse examination for the General class license will be those having no radiotelegraphy experience themselves.

The ARRL plan does recommend that the current 5 WPM Morse code examination be retained for the Amateur Extra class license. I agree with the ARRL and urge that the Commission continues to require all applicants for the Amateur Extra class license pass a 5 WPM Morse code examination.

Operating an amateur radio station is a privilege earned through examination of an applicant's qualifications. The quality of the Amateur Radio Service is more important than its number of licensees. These basic principles will be better served if the current 5 WPM Morse examination is retained for the General class license.

Very truly yours,

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