

I support this petition for rule making with only minor reservations. I believe this petition represent a balanced response to the intent expressed by the Commission and elsewhere to simplify the Amateur Radio service. I especially support the expanded privileges in the HF portion for the entry level license. This petition with the addition of minor testing guidelines (minimum 10 waiting period before retesting and mandatory multiple test sets over a 30 day period) as proposed in another petition (RM-10868) constitutes a way forward for the Amateur Radio service.

My reservations are as follows. First, I'm not adverse to the retention of the Element 1 requirement for the Extra class license alone. If the Extra class license is to be the pinnacle of all around achievement in the U.S. Amateur Radio service then this requirement could also be a consideration. This represents, in my mind, a reasonable compromise to this contentious issue and preserves a place for this special mode in a radio service whose legacy of performance under the most adverse conditions entitles it to spectrum allocation and universal respect it has earned.

Secondly, the inclusion of electrical limits (in paragrapn D.19.e) I consider burdensome to enforce and counterproductive to the spirit and nature of the service. The intent of protection of individuals is laudable. However, this seems to place an unecessary technology barrier between an entry level licensee and the potential "Elmer" who would guide and instruct the licensee on proper and safe use of the technology available in amateur radio.

Lastly, the induction of the "Communicator" license class name seems inconsistent with the intent of the license class or the other class titles. The titleof the license should not be as much a reflection of what the entry level licensee does with the priviledges but rather the level of skill achieved in Amateur Radio - similiar to the other classes General and Extra.

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