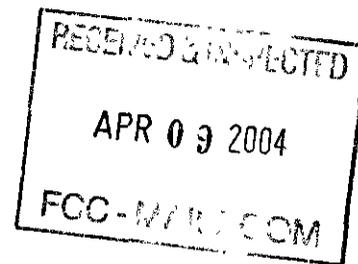


ORIGINAL COPY

Comments on **RM-10870**

Submitted to: Federal Communications Commission
445 12th Street SW
Washington, DC 20554



The National Conference of Volunteer Examiner Coordinators petition, RM-10870, is somewhat similar to the petition offered by the American Radio Relay League. It has some strong points including the consolidation of the Advanced Class license with the Amateur Extra Class, upgrading Technician Class licenses to General. Some restructuring of the HF bands is also appropriate, although I favor the reallocation proposed under RM-10768. I do, however, disagree with this petitions position related to the amateur radio question pools.

1. Consolidation of the Advanced Class license with the Amateur Extra is appropriate because (1) both licenses reflect similar levels of skill and (2) it will simply and make more efficient the administration of the entire licensing structure. Absolutely no license class should lose privileges. The slight gain in privileges by the Advanced Class is warranted, again, because the levels of technology associated with the classes are similar and the trade-off to simplify and administratively streamline the class structure is more than worth the move. The merging of the Advanced Class license without further testing absolutely should happen. Merging of the Technician Class and the General Class is also desirable for the same reasons.
2. HF privileges for whatever lower class structure is adopted through this petition or others should be subjected to the 100 watt maximum power limitation below 24 MHz and 50 watts above 24 MHz as described in this proposal. This power limitation minimizes interference on the bands and is a reasonable level of power for these classes.

I strongly encourage the Commission to consolidate the Advanced Class and Amateur Extra without further testing, upgrade Technician Class licensees to General without further testing, and set power limitation on the HF privileges in any new entry level licensing structure.

Respectfully submitted by:


John B. Brewer
603 Broken Bow Drive
Round Rock, Texas 78681

March 30, 2004

No. of Copies rec'd _____
List ABCDE _____

079