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Dear,FCC

My public to comment on the NPRM in WT 05-235 !

1. I am not opposed to access to specified or selective portions of the HF SSB spectrum to operators that would be currently licensed without any Morse Code administered exam element, even though Morse Code is authorized and used throughout all the spectrums allocated to Amateur Radio Operators.

I do feel that Morse code is another communications mode and should be afforded some sort of testing or proficiency “endorsement” as an incentive to achieving a higher class Amateur Radio license (i.e. Extra Class 15 WPM Test). Something should set the highest class operator level apart from the inexperienced and unskilled entry license level, as a minimum. Memorization is not a valid indicator of an operator’s skill.

Morse Code is available to those who wish to learn it and use it and since it is a valid and valuable Communication Mode, some sort of Morse proficiency (or endorsement/credit) should be required for those wishing to attain the highest license class (i.e. Extra Class). Morse Code has demonstrated repeatedly, its value, service and ability to maintain communications when voice or digital transmissions were unsuccessful or unavailable, contrary to non-factual statements made by those not willing to take the time or effort to learn the most basic level of Morse Code (5 wpm). The Tsunami Emergency Communication activity relied solely on Morse Code (CW) and clearly demonstrated, yet once again, its misunderstood value to the Amateur Service and local community.

2. Radiotelegraphy communications has been and continues to be a very popular mode and is used by many of the well established Operators, both Stateside and Foreign during contests, emergency demonstrations, DXpeditions, etc.. It has proved repeatedly to be reliable, accurate, faster and a more efficient means of communication then SSB. The use of Morse Code removes the language barrier and phonetic confusion as compared to voice communications. Digital communication still remains a minority mode of communication amongst amateurs due the continual evolving technology, cost of equipment, inconsistent ability to maintain communications during adverse conditions, etc., and yet, it is tested and evaluated on most Amateur Radio exam elements.

3. Requiring some sort of Morse Code Proficiency or Endorsement not only contributes to the overall ability of radio amateurs to understand and be able to use **ALL** modes allocated, but will assist in maintaining a valued service base of communicators in the event the Government calls upon the Amateur Community to assist in emergency communications, regardless of mode. The use of Morse Code has been attributed as being an “art” when in fact, it is a valuable service that may be called upon during adverse conditions. Continually, a great many amateur operator has learned the value of CW communication mode adverse band conditions (atmospheric and solar). Many a time, I myself was able to establish contact and maintain the contact with another station when SSB (voice) failed miserably. It was valuable that the other station was able to use an alternate mode (CW) else the

communication would have totally failed. The inability to adequately understand Morse Code (transmission and reception) is a great disservice to the Amateur Radio hobby/service and the country as a whole.

4. FCC evidence exists that Morse proficiency has never been a deterrent to obtaining an amateur license or in upgrading to a higher level license class. Facts exist that Morse Proficiency is an indicator of a well motivated and fluent communications operator that is able to provide communication service using a variety of modes, including but not limited to the transmission and reception of Morse Code signals. This can only add value to the Amateur Radio Service rather than limit the Amateur Radio Service with operators only able to use voice communications.

5. The Morse code requirement or demonstration of proficiency has never been identified as an advancement barrier to any level of Amateur Licensing. Past licensing figures support that premise as indicated by the large number of upgraded licensed operators that, through study, effort and attention, mastered the Morse Code element. The supposition that Morse is “filter” or “obstacle” for one’s advancement through the license class levels has been proven, repeatedly, to be a false statement and without merit.

6. The value of Morse code communication ability in the Amateur Service has been repeatedly demonstrated as much as voice communications. Amateur Radio by nature is a primarily recreational hobby and the various communication modes available and currently in use, reflect Morse Code transmission and reception to be second in popularity to voice communication. Maintaining some sort of licensing requirement that provides a Morse Code endorsement or incentive only can add value to the Amateur Radio service.

7. The most challenging problem in becoming an amateur operator today is the distraction of other forms of technical and communication modes that distracts potential newcomers from the hobby (i.e. internet, computers, FRS, GMRS, IM, etc). Another very challenging problem towards maintaining the integrity and ability of our Amateur Radio Operator pool is the push towards easier entrance criteria. The readily available actual test questions with answers only determines one’s ability to memorize without any possessing any real comprehension of the technical or communication material. The continual relaxing of the standards to “grow the numbers” have done nothing but bring harm to the Amateur Radio service. In the end, so licensed operators that possess neither the technical skill, or aptitude to advance the skill base of the Amateur Service and generate a new generation of what has been referred to as “appliance operators”. Reduce the testing standards or elements will only accelerate the loss of highly qualified and capable operators in the Amateur Radio Service. That, to me, is a detriment to our hobby and our country.

8. I do not have good ideas on how to change aversion to learning Morse Code. I don’t understand fully why some individuals feel so compelled to feel that they should have all the same privileges as those that have spent countless hours and effort in achieving their respective license class. Allowing individuals that have yet to demonstrate any real dedication or motivation to the advancement of the Amateur Radio service by completing the required test elements for each license class level will not only slap those that did take the time and effort, but cause an influx of operators that are sure to create more issues on some of the already trouble amateur bands with this mentality. I truly believe that the Achilles Heel to the Amateur Radio service is the attitude and mentality of some individuals (a minority to be sure) to relax the testing standards, allow for upgrades without demonstration of ability or skill level which ultimately, will erode the Amateur Radio service into a Service that will eventually resemble some far different then what Amateur Radio was initially established for.

9. Many MARS OPERATORS use Morse Code in their respective Amateur License Class and operate MARS HF SSB or other modes. To the Military, the ability and skill level of these operators are an invaluable service to their country and fellow citizens, regardless of whether they will ever be called upon to provide communications using or not using CW/SSB. In the event of a national emergency, MARS operators will be called upon to provide valuable communications, regardless of Mode.

Summary:

It is time Amateur Radio Service not to follow the mandates and dictates of other Countries by totally removing all forms of Morse Code testing. Relaxing the standards does not raise the bar but lowers the expectations and quality of the Amateur Radio Service. It is time for the FCC to maintain a highly skilled communicator base, not based upon numbers but upon abilities, skill and proficiencies. Doing anything less will erode the Amateur Radio Service to a potential base of operators only able to communication with an off the shelf piece of equipment, not able to fully grasp, understand or use all modes of communications available to them. This would be a great disservice to totally remove any Morse Code Testing or Endorsement incentive/element from the Amateur Radio Service.