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Federal Communications Commission
Electronic Comment File Submission
Re: WT05-235

Mr. Chairman and Commissioners:

Following are my comments relative to proceeding WT 05-235, In the Matter of Amendment of Part of the Commission 's Rules To Implement WRC-03 Regulations Applicable to Requirements for Operator Licenses in the Amateur Radio Service.

There have been many arguments posed in favor of eliminating the telegraphy requirement for an Amateur Radio license. I see no reason for me to rehash all of them at this time. Simply stated, it is my considered opinion that continuing to test for Morse proficiency as a prerequisite for licensing in the Amateur radio service is not in the public interest. Furthermore, the requirement serves no useful regulatory purpose, and is not consistent with the goals for the Amateur Radio Service as stated in the Basis And Purpose section of the Commission's rules set forth in Part 97.

Therefore, I support the proposed rulemaking to the extent that it would remove the telegraphy requirement for all license classes in the Amateur Radio Service.

I would also like to comment on the matter of operator privileges to be assigned to the various license classes in the event that the telegraphy requirement is removed. In my opinion, the current written examinations for the Novice, Technician, and Technician-Plus license classes do not, in my opinion, insure sufficient knowledge to safely operate an amateur station consistent with the privileges of the General Class license. The material covered in the General Class written examination simply is not covered in the exams for the Novice, Technician, and Technician-Plus classes. Therefore, I concur with the Commission's proposal to retain operator privileges for those classes consistent with those currently in effect. I state this with the realization that subject to the further modification of those privileges that would result from the separate proceeding and NPRM regarding the Phone Band Expansion, licensees holding those classes of license stand to receive a significant gain in operating privileges. I do not feel it is in the public interest to grant automatic upgrades to higher license classes without requiring applicants for those higher license classes to pass the appropriate written examinations. I also do not see a need for adding any new classes of amateur radio license. The reorganization of the Amateur Radio Service that took effect in the year 2000 has already dealt properly with the number of available license classes.

Finally, I agree with the Commission's proposal to refrain from enacting any rules changes intended to more closely regulate the content of the written examinations. Applicants who pass one or more written examinations qualify for either a new license, or an upgrade to a higher class of license. As noted by the Commission in the NPRM, the purpose of the written examination is to insure that the applicant can safely operate a station. The written examinations are not, and were never intended to be, tests of an applicant's technical level or operating skills, other than those necessary to safely operate an amateur station while said applicant is developing his or her technical and operating skills. In other words, passing the exam is the beginning, not the end. Successful completion of the examination causes the applicant to be granted a license, which bestows certain privileges depending on the class of license that is granted. It is what the applicant does with those privileges after they are

granted that demonstrates his or her technical level and operating skills. In fact, it occurs to me that, if one were required to be an electronics expert prior to obtaining an amateur license, then participation in the Amateur Radio Service would not be a viable means of training skilled operators and advancing the technical skills of those operators. This would not be in keeping with the Basis And Purpose of the Amateur Radio Service.

In closing, then, I find myself in complete agreement with the proposed changes to the Commission's rules as stated in the NPRM. I would like to express my appreciation to the Commission for its attention to this matter, and also, in no small part, for having "gotten it right" so to speak. While I am sure that this proposed rulemaking will generate considerable distress for some, I can say as the current holder of a General Class Amateur License that the Commission's proposed action on this matter is in the public interest and is in keeping with the Basis And Purpose of the Amateur Radio Service.

Thanks you for the opportunity to participate in the regulatory process governing the Amateur Radio Service. I look forward to the Commission's eventual Report & Order on this matter.

Sincerely,

John D. Kasupski, KC2HMZ
Tonawanda, New York