

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	) WT Docket No. 05-235
	)
Amendment of Part 97 of the Commission's Rules To Implement WRC-03 Regulations Applicable to Requirements for Operator Licenses in the Amateur Radio Service	) RM-10781, RM-10782, RM-10783, ) RM-10784, RM-10785, RM-10786, ) RM-10787, RM-10805, RM-10806, ) RM-10807, RM-10808, RM-10809, ) RM-10810, RM-10811, RM-10867, ) RM-10868, RM-10869, RM-10870

**To: The Commission:  
Comments on Notice of Proposed Rule Making (05-235)**

My name is G. Scott Davis, N3FJP. I became an amateur radio operator 29 years ago at age 14. I passed the 20 WPM telegraphy examination approximately 15 years ago on my way to earning an Extra class license. I support the Commission's Notice of Proposed Rule Making to remove the telegraphy examination; however, I believe that there is merit for retaining the requirement solely for the Amateur Extra class.

I also wish to encourage the Commission to address the very real need for an introductory license class with limited HF voice privileges at this time. As much has already been written concerning the telegraphy requirement, I will focus my comments on an introductory license.

**Need for Introductory License**

The Commission states in paragraph 30 of the NPRM:

*Regarding requests that we establish a new introductory class of operator license, we note that the requested license would authorize significantly greater HF privileges than the current Novice or Technician Plus Class license authorizes, but significantly less than the General Class license currently authorizes. We do not believe that such a new type of license is necessary because, as the Commission observed in the Phone Band Expansion NPRM, Novice and Technician Plus Class licensees can easily upgrade to the General Class, thereby obtaining access to significantly more spectrum than the requested new introductory class of operator license would authorize. We also note that, if our proposal to eliminate telegraphy testing in the amateur service is adopted, a person who is not a licensee will be able to qualify for a General Class operator license by passing two written examinations, and that a person who is a Technician Class licensee will be able to qualify for a General Class operator license by passing one written examination. We do not believe that these requirements are unreasonable, given the amount of spectrum available to General Class licensees. Accordingly, we deny the requests.*

The multi class license structure should be designed so that the introductory class offers enough privileges to introduce individuals to the service, while keeping plenty of learning incentive to increase one's privileges by passing higher class examinations. The Commission's position that a newcomer to amateur radio can easily and immediately enter the service with HF voice privileges by simply taking two exams is unrealistic in most cases. More importantly, it bypasses the intent

of the incentive licensing structure to promote additional study once the first license is earned because it requires a passing grade on two of the three written elements to obtain any HF privileges. The Commission's position puts the prospective amateur two thirds the way through the material before they can make their first HF contact.

Individuals from all walks of life including engineers, secretaries, elementary school students, etc., have an interest in the amateur radio service. While an individual with an electronics background may easily sit for both exams, the challenge is considerably greater for someone such as an 11 year old elementary school student, secretary or accountant without that background.

An entry level license is required that will allow a newcomer to become acquainted with amateur radio and provide enough privileges to offer a taste of the excitement of the service. Most importantly, the introductory license will help integrate the newcomer into the amateur radio community, providing the opportunity to begin the educational process to increase their training so that they can earn the higher class licenses.

The existing Technician class license does not adequately serve as an introductory license. Because of the higher power and extensive frequency privileges above 50 MHz provided by the license, the Technician exam covers more material than is appropriate for many individuals, and especially young people just developing an interest in the hobby. In addition, while there are many varied pursuits within the amateur radio service, the interest, attraction and excitement for many is the ability to communicate by voice over great distances on the HF bands; something the Technician license without code endorsement does not offer.

For many, the cornerstone of amateur radio is the excitement of making contacts on HF. With the exception of those with a code endorsement, the Technician license does not offer the best of what amateur radio has to offer. By restricting new hams to the VHF bands, many lose interest in the service. For many, their entire sense of amateur radio may be what they experience in their first few contacts on a local VHF repeater.

To provide those with an interest in amateur radio a solid launching point to enter the service, I strongly urge the Commission to create an entry class license designed around the following parameters:

- The frequency privileges should be minimal, but should include voice privileges in small slices of the 80, 40, 15 and 10 meter HF bands. Privileges on the popular 2 meter VHF band should also be offered so that the newcomer can contact and seek assistance from local hams as he studies for higher license classes. Several well planned suggestions for specific frequency allocations such as those offered by ARRL were included in the original petitions, and I encourage the Commission to choose among these options.
- The power privileges should be set below those recommended for evaluation of RF exposure limits. This will promote safety for the newcomer and reduce the material necessary for the exam.
- The exam content should focus on the FCC rules, basic amateur operating practices and safety.

### **Second Alternative – Add HF Voice Privileges to Technician Class**

If the Commission does not see fit to create an introductory license class, an alternative is to add minimal HF voice privileges to the Technician class license. As the current Technician class already offers CW HF privileges to those passing the telegraphy requirement, clearly the Commission believes that a person passing the current Technician exam testing material is competent to operate an HF station. The same small slices of HF voice privileges recommended in the original petitions could be authorized for the Technician licensee, thereby providing the newcomer with the important experiences detailed above.

Offering limited HF privileges at the entry level will align operating privileges with the intent and structure of the incentive license program. It will allow newcomers to better integrate with the amateur radio community and give them first hand experience of the excitement of amateur radio and a better understanding of the benefits of upgrading. This will support the Commission's goals of encouraging individuals who are interested in communications technology, or who are able to contribute to the advancement of the radio art, to become amateur radio operators; and promote more efficient use of the radio spectrum currently allocated to the amateur radio service.

While adding limited HF voice privileges to the Technician license would be a much needed and positive step, the creation of a separate introductory license class would be a much better option since the educational material would be more appropriately tailored for those brand new to the amateur radio service. I strongly encourage the Commission to consider and implement one of these two alternatives.

Thank you for the opportunity to express my encouragement for the creation of an introductory license class.

Sincerely,

G. Scott Davis  
Extra Class Amateur Radio Operator - N3FJP