

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 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)

TO: The Commission

COMMENTS OF THE LEWES AMATEUR RADIO SOCIETY (W3LRS)
& RICHARD N. DREVO, W3GNQ, PRESIDENT

COMMENTER/S

1. These are the comments of the twenty-seven licensed members of the Lewes Amateur Radio Society (W3LRS) and Richard N. Drevo, W3GNQ ("this commenter"), license grantee of amateur station W3GNQ; a Commission-licensed amateur operator of over forty-nine years; and an Amateur Extra Class licensee for almost twenty-seven years. These comments are being filed in response to the Notice of Proposed Rule Making and Order ("Notice") in the heading Docket. This commenter is a volunteer examiner ("VE"); a volunteer license examination preparation instructor; and the author of a number of technical articles published in the amateur service print media.

The commenter/s have a great interest in the future well being of our amateur service and for maintaining harmony and goodwill within our amateur service community. Success in this endeavor would allow the amateur service community to better fulfill its purpose of the service and would better enhance the usefulness of the amateur radio service to the public.

INTRODUCTION

2. In the Notice, the Commission proposes to revise our amateur service rules to eliminate the telegraphy testing requirement for a General or Amateur Extra Class operator license grant. It believes that this proposed rule change will allow amateur service licensees to better fulfill the purpose of the amateur service and will enhance the usefulness of the amateur service to the public and licensees. The Notice demonstrates that the Commission has an excellent understanding of the unique nature of our amateur service. This commenter, however, takes exception on two very critical issues:

CONTINUE THE TELEGRAPHY REQUIREMENT FOR AN AMATEUR EXTRA CLASS LICENSE GRANT

3. Throughout the years the telegraphy examinations have served our amateur service exceptionally well in that it has provided “entry level” amateurs a vehicle to (a) learn and become proficient with morse code – which, even in today’s modern communication technology advancements, remains, even after a century, to be the only reliable baseline form of dependable “backbone” communications available in the event of national disasters and civil emergencies when the newer fragile modern technologies fail; (b) provide exposure to the many facets of radio communications including HF communications which they otherwise might not even be aware of without a minimal morse code requirement; (c) learn to communicate with other amateurs when solar ionospheric conditions will only allow very narrowband communications; and (d) continue to allow such notable organizations including the Boy & Girl Scouts of America to earn radio merit achievements and their Eagle Badge and Gold Award Scouting goals, respectively

The Emergency Communications networks within the U.S. including the ARRL / ARES / NTS, FEMA / RACES as well as the multitude of other organizations officially recognized for decades by Federal, State & local agencies, have long realized and continue to recognize the critical importance and value of CW Morse Code during periods of National Emergencies and Disasters and, now, potentially more international terrorist attacks.

The Morse Code (CW) provides for less radio interference, provides a significant level of security of communications, requires very simple transmitting and receiving equipment, and provides longer range communications for a given amount of transmit power. Furthermore, in the recent Katrina and Rita hurricane disasters HF communications were poor for voice communications, digital communications were non-existent and Morse Code was again proven to be the only reliable mode of communications throughout the emergencies. The continuation of this extremely valuable national resource will gradually diminish over time if the international morse code requirement is eliminated entirely as a basic requirement for US licensed radio amateurs.

It has become very apparent that ever since the entry level novice class license was eliminated and the code requirement subsequently eliminated from the technician class licensees, a significant number of new licensees opt only to purchase a low power VHF/UHF transceiver or a handheld for the purposes of communicating with other amateurs through FM repeaters. This, we believe, is a very negative trend since it does not encourage any future learning of the many technological and broad communication and operational aspects the amateur radio service has to offer it’s licensees.

SUMMARY

In Summary, the continuation of a minimal Morse code requirement will help us maintain our cadre of Amateur Extra Class operators. This will allow our amateur service community to better fulfill the purpose of the amateur service and would continue to enhance the invaluable service provides not only to the US Government, its Federal Agencies, State & Local Government, but, as well, to the general public than would the deletion of the requirement. We also support the addition of an “entry

level" amateur radio license class.

Respectfully Submitted,

Richard N. Drevo, W3GNQ

President, Lewes Amateur Radio Society, W3LRS

October 20, 2005