

While I have my own comments regarding the proposed rule to eliminate the telegraphy testing requirement for Radio Amateur (and that comment will follow), I would like the FCC to reconsider the advice and council of the ARRL, which represents the broad base of Radio Amateurs in this matter, and which has demonstrated both the technical expertise and operational understanding around this issue.

While commercial and marine services have eliminated the use of radiotelegraphy, this is in large measure driven by considerations for economics. With radiotelegraphy, those services were required to provide facilities and trained operators, a significant ongoing expense. The advent of robust digital modes and cheap computers has overcome those economics, even though the advantages of simplicity and reliability still exist for radiotelegraphy.

Economics, however is not the driving factor for Radio Amateurs. Within the Amateur Radio Service, the simplicity of radiotelegraphy and its proven weak-signal reliability continue to be major factors in its popularity and longevity. Clearly, it is not the only choice. But it is often the best choice, and a significant one that is supported not only by nearly a century of tradition, but by well-established current practice.

I have observed in recent years, that the reduction of the speed requirements for telegraphy testing has resulted in a gradual overall decrease in morse proficiency on the Amateur bands, as evidenced by slower average speeds. Nevertheless, radiotelegraphy is as popular as ever. It has a deeply rooted tradition in amateur radio, that contributes significantly to the overall quality of the service, and provides for increased discipline and a sense of pride that accompanies Amateur Radio.

But because of that observed gradual decrease in proficiency, I am deeply concerned that the complete elimination of telegraphy testing will encourage many amateurs to investigate the mode without the basic skills or knowledge necessary to properly operate in the designated sub-bands. Of particular concern is the Extra Class sub-bands, where long-distance, weak-signal, and high-speed telegraphy communications take place routinely. These are small but important sub-bands. Traditionally, they have been reserved (by regulation) for Extra Class licensees because of their value

to the Amateur community, and because the FCC recognized that those sub-bands would be both an incentive to upgrade, and a safeguarded spectrum for experimentation and advancement of the technological state-of-the-art. The protection of those sub-bands, and the need to reserve them for the most qualified individuals, then, seems imperative. To allow unskilled but well-meaning individuals access to these sub-bands would be very ill-advised.

I would suggest and recommend, that as long as radiotelegraphy is a dominant mode in Amateur Radio, the FCC must maintain the Extra Class sub-bands for skilled and qualified licensees. While it may not appear to be obvious to a non-telegrapher, it is nonetheless true that the basic skills and operating procedures for telegraphy must be acquired by both study and practice, and the only way to assess that skill is through testing. Only in this way will we assure some portion of the Amateur bands is dominated by the highest level of both operating and technical practices. This is the purpose of the Extra Class license, and this purpose should be recognized and protected.

I therefore heartily recommend that the FCC amend the proposed rulemaking to preserve a requirement for Extra Class applicants to demonstrate the ability to receive morse code by ear. I further recommend that that speed be a minimum of 5 WPM, as required currently for General and Extra Class licensees.

Thank you for your due diligence and consideration in this matter.

regards,

Monty Northrup  
Extra Class Licensee N5ESE