

I am writing to strongly protest and disagree with FCC NPRM proposal 05-235, which would eliminate any requirements for Morse Code (CW) for American amateur radio licensure. Further, I encourage you to accept the proposal of the American Radio Relay League to retain a CW requirement for the Extra class licensure.

In this time of heightened national security, elimination of CW requirements is simply the wrong move for American amateur radio. I will detail my points below, for your consideration.

1) CW is still the last option for communications during times of man made and/or natural disasters and emergencies. I recently returned from the Mississippi Gulf with a deployment with the Red Cross Disaster Services after Hurricanes Katrina and Rita. There, I saw the total failure of high tech communications systems, including but not limited to cellular phones, landline telephones, 800 Mhz systems and the Internet. Further, on a minimal level, after a recent lightening storm in my neighborhood, our cable services provided by Time Warner Cable were knocked off. Not only was cable TV gone, but also all of us who had cable Internet and the unfortunate persons who had recently switched telephone services to cable. We were told that it would take a WEEK before any of our cable services would be restored! And this was a simple lightening storm. Both these catastrophic and minimal natural weather events highlight the vulnerability and lack of reliability of higher tech modes for consistent and necessary communications.

2) CW requires the least technological equipment available. It is the most efficient means of wireless communications available. It succeeds where digital and voice fail. CW equipment is portable, and can be run on batteries charged by a solar panel. There are many amateurs who routinely demonstrate such CW communications for recreation, while hiking the Appalachian Trail or hiking in other wilderness areas in the United States.

3) Internationally, CW is still used by other countries, such as the Soviet Union and in developing countries, where persons or governments can not afford expensive communications systems.

4) CW is still used by some military and special forces, and known as the last form of communications

5) As a member of our state's Emergency Response Team, I can affirm that CW is a useful communications medium. I make almost daily CW contacts with other radio amateurs (although not on an emergency basis).

6) Entry-level CW can be learned by almost anyone willing to give effort and practice. Professionally, I am a neuropsychologist who works in a large Neurology practice. I have taught CW to persons who have sustained a traumatic brain injury or stroke. With older amateurs, I have encouraged them to return to CW as a brain exercise, which may help delay abnormal aging or dementia. (I do not have scientific data on this, but it is well demonstrated that mental exercise in later life can delay abnormal brain aging and keep mental faculties sharp.)

7) The American Amateur Radio Relay League (ARRL) the national amateur radio association, also internationally respected, recommended retention of the entry level CW exam (5 Words per minute) only for the most difficult level of amateur licensure. I would hope that the FCC would listen to our

August and respected voice for American amateur radio.

8) CW is not a barrier for amateurs wishing to increase their knowledge and practice of the radio arts. A review of the number of amateurs per licensure class shows this. Some Technician class amateurs are not interested in learning the minimal but advanced electronics necessary for General class licensure. However, when many Technicians upgrade, they are unable to have a High Frequency station of any sort, not only due to the cost of HF equipment, but more due to the burdensome antenna restrictions in their communities. As such, CW is not a barrier to licensure advancement.

9) With the elimination of CW for amateur licensure, then the elimination of the CW sub-bands will surely follow. It will be a travesty to see the elimination of our CW privileges due to administrative legislation of the FCC, without a consideration of great number of radio amateurs worldwide who continue to practice and enjoy communications via CW.

10) Finally, I would be remiss if I did not mention the role of Morse Code historically. "Spark" was the "original digital." Morse Code was absolutely critical in saving the passengers of the Titanic. At its time, the Titanic was touted as the greatest technological achievement of its age. Its tragic history should keep us aware that in our times, the greater the technology, the greater potential for catastrophic failure. In such times, retaining knowledge and practice of tried and true technologies such as Morse Code can only be beneficial when we see all other forms of communications fail.

In closing, I reiterate my strong disagreement with the FCC proposal to eliminate any Morse Code requirements from any amateur radio licensure class. I hope the FCC will at least follow the recommendations of the ARRL to retain an entry-level knowledge of Morse Code for the Extra Class amateur licensure. I sincerely thank you for your consideration of my thoughts.

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