

I oppose the NPRM&O which proposes to eliminate the 5 WPM Morse Code requirements for all license classes. Morse Code is still a useful mode of communication, particularly in poor signal path conditions on the high frequency bands. Message traffic can often be communicated with Morse Code in marginal conditions that are very difficult or impossible for voice or digital modes. This is extremely important for emergency communications, which often rely on poor antennas, low transmitter power, and without the luxury of being able to wait for improvement in conditions. Morse Code of the Continuous Wave (CW) variety is an extremely efficient use of spectrum compared to other modes, occupying very little bandwidth. The seemingly slow speed of data transmission can be largely overcome by skillful composition of the text to be transmitted, reducing word count to only those that are necessary and meaningful, and by use of abbreviations. Data transmission rate of complex words such as people or street names is usually faster with Morse Code than with voice modes, and the accuracy in communication is almost always higher as well. Throughput rates on formal written traffic nets proves that this is true. Digital modes can have a high data rate, but much of the data is often of little real value or importance. The skill needed to make an efficient 2 way communication with Morse Code of course requires effort and practice. This is no reason to relegate the mode to the scrap heap. Although the proposed rule change would still permit Morse Code, it is likely that very few new license applicants will take the time to learn the skill, and therefore the mode will decline and disappear within a few years. The mode is still worthwhile and should be preserved for Amateurs, whose needs and uses are vastly different from commercial and military users who have abandoned the mode. Elimination of the Code is not needed for the purpose of attracting new Amateurs. The entry level classes already do not include a Code requirement. Those who have a high desire to obtain high frequency privileges will take the time to learn the Code. If FCC decides to delete the Code requirement for General Class, or some other entry level classes with significant high frequency privileges, then I recommend that the Extra Class bands be very significantly expanded relative to other high frequency license classes. The Extra Class, under this proposal, should have a 15 word per minute or higher Morse Code requirement and a significantly challenging and comprehensive written examination. An applicant who meets all of these requirements will be rewarded with a license with truly meaningful and significantly increased privileges, including maximum Amateur transmitter power allowances instead of reduced power for lesser licenses. The successful applicant would be justifiably proud of the accomplishment, obtain a suitable reward in increased privileges, and the United States would gain an operator who is more accomplished and capable than many of today's new licensees.