

This is a comment in reply to various commenters who have suggested that the 5 WPM code exam be retained for the Amateur Extra Class only. The most notable of these is from ARRL although it is clear that many individual commenters have followed their lead.

First, as a holder of the Amateur Extra class license and as a longstanding ARRL member I wish to make it clear that the ARRL filing does not represent my views on the matter.

While many commenters have presented the virtues of CW they have failed, in my opinion, to provide any new argument not previously considered by the Commission as to why code test retention has any legal or regulatory purpose. Those proposing a "compromise" to retain the exam for the Amateur Extra have conceded that there is no such purpose for access to HF or obtaining the General Class license. Given that no further justification is presented as to why there is such a purpose for the Extra this appears to be more a last ditch attempt to keep CW than a reasoned justification. The cited reasons - pride, tradition, requiring effort - are not valid regulatory purposes. In fact there seems to be a note of schizophrenia in some of the reasons cited. For example, learning code shows a high level of commitment versus it is so easy a child can do it or CW is clearly very valuable versus if we do not force it upon newcomers its use will disappear.

One other aspect was that many commenters really were not aware of the current rules as evidenced by such requests as retain code for the Technician Class. Other wanted to be sure that removal of the code testing would not remove the "CW" bands. While I agree with this intent, it is worth noting that the only CW exclusive bands in the Amateur Service today are in the 6 and 2M bands, open to all license classes already.

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