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To: Secretary, Office of the Secretary Federal Communications,
445 12th Street, SW, Room TW-A325, Washington, DC 20554

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WT Docket No. ⁰⁵05-235; FCC 05-143

COMMENTS

SOME WIN-WIN SUGGESTIONS

Petitioners seem to want easier Morse code requirements for obtaining a radio license without making the citizens more vulnerable during disasters requiring radio communication. Also they want more growth in the size of the radio operator population. However, if the licensing requirements were greatly reduced or even eliminated, the growth rate would probably remain small because the potential operators are more attracted to computer internet connection than to radio operation. That is because the internet provides noise free communication plus vivid color images so easily. Knowledge of Morse code is still needed for communications under hostile conditions and for identification of stations with automatic Morse ID's. Since we can not satisfy everyone, the following comments are provided to support a WIN-WIN proposal of retaining the present 5 w.p.m. ~~1994~~ ¹⁹⁹⁴ ABCDE test except for authorizing the use of a passive Morse code decoder

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type of flow chart. Permitting the use of the decoder chart has the following advantages compared to elimination of the code test.

1. Although the code test is not eliminated, it requires only a very short time to develop enough skill to pass the 5 wpm test. *with the chart*. Yet, a chart user will have learned enough about Morse code to communicate in an emergency by using the decoder chart. Furthermore, even if a person does not have a chart after he passes his test, he will know how to draw another decoder chart if one is necessary.

2. If desired, separate rule making could simplify commercial radio licensing so that the radiotelegraph license is eliminated and a 5wpm code test is added to the General Radiotelephone license to enable radiotelephone operators to identify stations by their automatic Morse code ID's.

3. The advantage of using a decoder chart is that it is fun to use for a beginner and he is not so likely to suffer burn-out and loss of interest in Morse code communication.

4. Use of the decoder chart is an effective way of making Morse code useful to someone who does not even know the code. It helps the student learn by total emersion. That is because chart use conditions the reflexes to receive all the letters of the alphabet right from the beginning. ~~That is because~~ Unlike older methods, this technique does not teach the most difficult letters of the alphabet on the last day of an instructional class. The chart makes the decoding of difficult letters simple, easy, and effective right from the start.

5. Elimination of all Morse code requirements without requiring

knowledge of a decoder chart might produce radio operators so unskilled with Morse code that much property and many lives could be lost in the future disasters. For example, reliance on the high technology of GPS caused at least one accident for a passenger carrying ship. Fortunately no lives were lost. In the USA, if total reliance on high technology communication cost us the loss of lives, it is likely that heirs of those lost in such a disaster would sue the government, the Commissioners, and other organizations which promoted no code licenses.

6. A copy of the article describing the decoder chart usage is included. The article was in the June 2001 issue of Amateur Radio Today.

7. My experience as a teacher of "Let's Learn Morse Code" by decoder chart at William Rainey Harper College's Continuing Education Department of LLI taught me that only a few people are interested in learning Morse code. However, everyone from age 12 years to past middle age greatly enjoyed ~~to use~~ ^{using} the decoder chart. For the students, decoder chart usage was a kind of game that was fun, interesting, and useful right from the beginning. People seemed to think that the use of Morse code was a difficult, useless, esoteric activity UNTIL they used the decoder chart to receive a message.

8. The decoder concept is not new. ARRL published a description of a primitive/60 to 70 years ago by a man who could not learn the Morse code until some friend showed him how to make a decoder chart.

9. If the decoder chart becomes popular, a separate petition to authorize Morse code and digital modes on Citizen Band @ 27 MHz may occur.

Morse Code Decoder Chart

NOT for taking the test.

To use the chart, look at the middle of the left side of it, at the left side of the junction of the "E" and the "T" rectangles. Then if you hear a "dit" or a short sound, move your eye up and slightly to the right to letter "E". If, on the other hand, the first sound is a "dah" or long sound, go slightly right and down to letter "T". If that is the end of the letter sent, you have properly identified it as an "E" or a "T". If the letter continues, simply move your eye slightly right and up for dit or down for dah.

For example, if ". ." is sent, move your eye up and then up again as it goes to the right and stop on "I". If ". -" is sent, go up and then down to "A". If "- ." is sent, go down and up to "N". If "- -" is sent go down and down to "M".

One desirable feature is that the chart encourages the user to concentrate on the letter being transmitted, and not on writing it. Copying a few letters or a few words behind the transmission is characteristic of high speed CW operators. If you start doing what they do, high speed will come quicker and easier.

When I was teaching marine electronics to members of the United States Power Squadron Boating Club, I drew the chart as a supplementary training aid to the text. The students were not required to learn the code, but with the chart they could understand it. For example, they could recognize the one or more Morse letters transmitted by shore-based or floating navigational aids, like flashing lights or radio beacons. When a boater knows the identity of the navigation aid, he can get a fix on his location. That information could be vital in the case of a storm or fog, or the need for urgent help.

Anyone can learn 5 wpm International Morse Code after a few hours practice with this chart. Then, after learning some electronics theory and radio rules, you can pass the exam under the new 5 wpm rules (without using the chart).

The Morse decode flow chart was not original for me. Like everyone else, I stood on the shoulders of others. I saw the chart in a magazine, perhaps 30 or 40 years ago — long before the computer flow chart craze. The chart had enormous impact on my God-given bionic memory. I remembered the chart, but unfortunately forgot the originator and his publisher. My thanks (and apologies) to whoever that might be.

As you can see, a second benefit of the chart is enabling a person to receive an emergency message even though he does not know the code.

A third feature is that the chart is smaller, lighter, and cheaper than electronic Morse code decoders. In addition, it has nonvolatile memory — if you don't spill the coffee on it or store it in the sunlight for too many months. Then, also, you will save money because no batteries are required. You can use your savings to buy more magazines like this one, which helps support unemployed radio/electronic wizards, like me, as free-lance writers.

It is necessary to use a bit of caution while using the chart, because it can become a time gobbler, just like a computer. One Scoutmaster in the US Power Squadron Boating Club heard me explain the chart. But when he demonstrated it to his Scouts, he had a BIG problem. His Scouts went bananas — absolutely bananas — and wanted to keep practicing all night with it.

E	I	S	H
		U	V
	A	R	L
		W	P
T	N	D	B
		K	X
	M	G	C
		O	Y
		Z	
		Q	

Table 1. The dummy's dynamite, cyclonite, Morse code decoder flow chart, with non-volatile memory. Read left to right and go up for dits and down for dahs.

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Morse Code Chart by K9GBL

E	I	S	H
		U	V
		R	F
		L	
A	W	P	J
		B	X
		C	Y
		Z	
T	N	D	
		K	
		G	
		Q	
M	O		

Dits Up

Dahs Down