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FCC - MAILROOM

Chairman Martin and Commissioners
Federal Communication Commission
445 12th Street SW
Washington, DC 20554

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Re: WT Docket No.05-235; FCC 05-143

Chairman Martin,
Commissioner Abernathy,
Commissioner Copps,
Commissioner Adelstein,

In response to the FCC's request for comments on WT Docket No. 05-235, I am sending in my comments on whether the 5 words per minute Morse code requirement should be removed from the test for an amateur radio operator license. Morse code requirements should be kept for at least one class of the amateur radio operator licenses. After experiencing September 11, 2001, as a DC resident and now as a law student in Tennessee during the recent hurricane season, I feel that these post-disaster situations illustrate why Morse code proficiency should be a requirement to operate an amateur radio, at least for certain classes of licenses. As we all saw in news reports or heard from people first-hand, amateur radio operators were an important part of the rescue effort in areas of Louisiana, Mississippi, and other storm-ravaged areas that were without electricity. These amateur radio operators need to be able to communicate even when most of modern technology is not functioning. Although some can argue

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that the 5 words per minute requirement will limit who can pass the test for an amateur radio license, it would be better for the field to have a few less licensed operators who are skilled enough to be able to communicate no matter the situation.

Reasons Morse Code Should be Required

Even in this day and age, modern technology can be unreliable. Phone lines can go out of service, computers can malfunction and cell phone networks can be busy even on a normal day. When you add, natural disasters with flooding, downed power lines or any other amount of variables to this, modern technology can be even less reliable. Therefore, licensed amateur radio operators should have the knowledge and ability to use the lower tech methods of communication like Morse code in case the other systems of communication are down.

Although amateur radio operators may never need to use lower tech equipment of communicate using Morse code, unexpected events like the terrorist attacks in New York and Washington on September 11 as well as natural disasters like the recent hurricanes that have hit the Gulf Coast may make Morse code the only reliable method of communication. With the amount of amateur

radio operators that volunteer to help relief agencies after major disasters¹, these operators should have the skills and knowledge to get the communications through no matter what level of technology they have to work with.

What might have happened if no amateur radio operator in the storm-damaged area knew how to send messages via Morse code? As Gary Krakow discussed in his September 6 column, "operators of amateur, or ham, radio have been instrumental in helping residents in the hardest hit areas, including saving stranded flood victims."² After any disaster, amateur radio operators set up networks of volunteers to work to provide information, including helping rescue workers find stranded victims. This is an especially important time to have access to communication other than cell phones and landlines. As is often the case in disasters, the phone lines get jammed with too many people all trying to make calls at the same time. I distinctly remember trying to get through to friends and family while walking home from my office on September 11th. I was unable to connect with many of my friends in the Washington area as well as New York, and my friends and family were also unable to reach me for hours. Most people I spoke with had the same experience. We have seen this again in New Orleans and other storm-ravaged areas. Days go by while people are unable to communicate to loved ones that they are safe or need help. When disasters occur, we need to have the networks of radio operators ready to

¹ www.arrl.org

² <http://msnbc.msn.com/id/9228945/>

communicate – in whatever situation they find themselves in with whatever method they can use.

Those who live in storm-ravaged parts of the country had additional difficulties in communicating because of the loss of electricity. These amateur radio operators were able to get messages through to rescuers so that stranded flood victims were rescued as soon as possible. Without skills in Morse code, many of these messages would not have gotten through, and many of these victims would have been rescued much later or would have been found after it was too late. In addition, family members would have had a harder time locating missing family members without this resource.

It is understandable that some see the Morse code requirement as an outdated and unnecessary requirement for the amateur radio operator license, but the requirement should be kept for at least some of the license classes so that the skill will not disappear. By eliminating the requirement totally for all classes, we run the risk of having no operators conversant in Morse code at a time when operators can use only the lowest tech equipment that requires Morse code for communication. By just requiring Morse code for certain classes of licenses, this prevents the knowledge of Morse code from becoming an obstacle that stops too many people from gaining access to amateur radio.

Some may argue that eliminating Morse code from the requirement for an amateur radio operator test would open up the field to many who would otherwise not be able to participate. However, by lowering the standards to

become licensing requirements, you would just get a pool of less skilled operators. If a person wants to become an amateur radio operator, that person will have the incentive to pass the test, including the 5 words per minute Morse code requirement. Certain states do not require knowledge or ability to parallel-park a car before giving someone a driver's license. If a person claims that they will never need to parallel-park, can they skip over that requirement in the driving test? I would hope not, but that seems to be the argument that the other side is making.

According to some amateur radio operators, the FCC could be weakening the service by doing away with the Morse code requirement.³ Some operators argue that the removal of the Morse code requirement will 'dumb-down' the service and lower the on-air discipline.⁴ Because these licensed operators are so integral during and after disasters and it is a critical time for those communicating on amateur radio to be extremely disciplined and skilled at whatever method is necessary to communicate, I think the test for licenses should require stringent discipline, like learning Morse code. Hindsight is 20/20, and the inability of many operators to communicate vital information after a disaster would be an awful way to learn that Morse code is a necessary skill for an amateur radio operator to have.

³ www.arrl.org/news/stories/2005/08/02/100/?nc=1

⁴ *Id.*

Another argument put forth for keeping Morse code is that it is a universal method of communication.⁵ Certain Morse code symbols cross language barriers, allowing amateur radio operators to communicate, to a degree, even without a common language. In a world that is getting smaller and smaller, it is a benefit for people to be able to communicate, even across language barriers. As people continue to move or travel to countries around the world, it is helpful to have a method of communicating in any type of situation. After the amount of natural disasters that have occurred in the US and around the world in recent times, it would be beneficial to have a method of quickly communicating, even in adverse conditions that may not allow for high tech communication. Also, this ability to communicate with amateur radio operators from around the world increases the community feeling.

Finally, because Morse code is a lower tech method of communication, it can be a less expensive method of communicating. By requiring at least one class of licensees to know Morse code, the FCC will be keeping the process open to those who do not want to or cannot spend a lot of money to become amateur radio operators. Most people could plug in the expensive, high tech equipment and talk over the amateur radio, but that also assumes that the person has the money to spend for all the equipment. By keeping a pool of people who still understand and communicate through Morse code, the FCC is keeping amateur radio operation affordable for those who want to participate.

⁵ Id.

Conclusion

In summary, I believe the FCC should keep the 5 words per minute Morse code requirement for at least certain classes of amateur radio operator tests. It has proven to be a needed skill for communication, especially after disasters, and the skill should not be lost. Too often, natural disasters and other events require communication through lower tech methods of communication like Morse code. By limiting the Morse code 5 words per minute requirement to one or more of the licensing classes, this should be enough to allow anyone who would like to be an amateur radio operator to get some form of licensing.

Also, this form of communication can foster a sense of community across language barriers. Because of the increase in global business and communication as well as travel, methods that facilitate communication between radio operators in other countries are beneficial and should be considered.

Sincerely,

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