

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Amendment of Part 97 of the Commission's Rules)
To Implement WRC-03 Regulations Applicable to) WT Docket No. 05-
235
Requirements for Operator Licenses in the)
Amateur Radio Service)

To: The Commission

Comments of Eric R. Ward
N0HHS Amateur Radio Operator, submitted in reply to comments submitted
on October 31, 2005 by ARRL, the National Association for Amateur Radio

I, Eric R. Ward, an amateur radio operator granted call sign N0HHS, hereby respectfully submit my comments in reply to comments submitted on October 31, 2005 by the American Radio Relay League, Inc. (ARRL, the National Association of Amateur Radio) regarding the *Notice of Proposed Rulemaking* 05-143 (the Notice) in the above-captioned docket.

The ARRL makes cogent points regarding license class restructuring, which likely should be addressed by the Commission in the future. However, any additional review of the current license class scheme can only further

delay the elimination of the Morse code requirement¹ from licensing for the amateur service.

As I pointed out in my previous comments filed September 1, 2005, the rationale for elimination of the requirement is clear, as laid out in the Notice and in several of the Petitions it addresses. Specifically, the *Radio Regulations* of the International Telecommunications Union no longer require proficiency in Morse code, and the only reason cited previously² by the Commission for maintaining the Morse code requirement was the continued presence of the requirement in the *Radio Regulations*. Since such international requirement no longer exists (effective the WRC-03, in July, 2003), the sole remaining rationale for maintaining a Morse code requirement has been removed.

Numerous other countries have eliminated the code requirement since that July 2003 WRC; in some cases immediately, within days of the conclusion of the Conference. The rule-making process in the United States of America is thorough and robust, and provides ample opportunity for all stakeholders to submit their views on any issue. The Commission has in the above-captioned matter been diligent in its application of the process, despite the obvious conclusion which it must reach if it takes into account its own previously stated rationale for maintaining the Morse code requirement.

¹ See 47 C.F.R. § 97.503

² See FCC 99-412

It now behooves the Commission to expedite the implementation of this obvious conclusion in the form of a Rule and Order as soon as feasible, given the many simultaneous demands put on the time of the Commission's diligent staff. Consideration of other aspects of licensing in the Amateur service at this time are not in the best interests of the public served by the Commission. The public deserves the speedy implementation of obvious regulatory conclusions.

Respectfully submitted,

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November 6, 2005