

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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

Reply To Comments Of The American Radio Relay League

Submitted electronically on 6 November 2005 by:

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General

This Reply to Comments concerns itself with the American Radio Relay League (ARRL) Comment on WT Docket 05-235 filed on 31 October 2005. It will point out some areas in the ARRL Comment that appear to be disingenuous statements of ARRL *belief*.

The ARRL

1. The ARRL promotes itself as *The National Association For Amateur Radio*.¹ Founded in 1914 as a local club of New England radio amateurs, it is incorporated as a *non-profit* organization and uses that on their federal income tax returns.² While ARRL stresses its description as a membership organization, observation of their media and products resold by them indicates that *publishing* is a very big part of their overall activity and a major revenue source. From the 2003 ARRL federal tax return, their total revenue (for 2002) was in

¹ So worded on the title page of their Comment and in their media.

² Copies of those federal income tax returns have been digitized and posted on the Internet website <http://www.kr4uq.org/index.html>. Returns for years 1999 through 2003 are found there as ZIP files. ARRL has published its own history. That history overlooks the existence of the *first* United States club, the *Radio Club of America*, founded in 1909 and still in existence today.

excess of 11.5 million dollars.³ While the top five officers of ARRL are elected and presumably pay their own way on ARRL activities, the top five *paid* positions had 2002 annual compensation total of \$533,092.93, employee benefit contributions totaling \$25,885.02, and total expense accounts of \$30,455.82.⁴ Their compensation to external legal firms (both in the DC area) for 2002 were \$103,916 to Booth, Freret, Imlay & Tepper PC and \$68,268 to Chwat & Co. The total compensation for 2002 *other salaries and wages* (line 26, Part II of return) was \$12,387,209. ARRL had 23 employee positions receiving compensation in excess of \$50,000 in 2002 (Schedule A, Part 1). *Total expenses* for 2002 (Part II, line 44 of return) were \$12,387,209. It seems unlikely that ARRL is a de facto tax-exempt operation even though they are so de jure for taxation.⁵ There should be no doubt that ARRL is a large and somewhat diverse organization which derives real profit from a great number of publications.

2. ARRL membership as of 30 June 2005 was 149,583.⁶ As of about May 2005, the total number of United States amateur radio individual licensees (exclusive of *clubs*) was 723,446.⁷ The ARRL membership represents only 20.7 percent of all licensed United States radio amateurs. **Voting** membership in the ARRL is possible **only** if a person possess an amateur radio license. While those without amateur licenses may join and receive the monthly membership magazine QST, they would be only subscribers and have **no** representation. ARRL continues to promote itself in media as *representing amateur radio* yet they do **not directly represent** 4 out of 5 licensed United States radio amateurs.

3. There is **no** readily-available information on the *demographics* of ARRL membership. One can only infer that ARRL staff and various Section/District Manager officers have Amateur Extra licenses by comparison of their callsigns against databases. Again, by observation of periodical article authors, letters to the editor correspondents, various specialized handbook authors, license class is towards the so-called *highest class*. There are few officer or staff positions (of prominence) with *lower* classes. Ages may only be estimated from observation of media images of individuals. Essentially, the demographics seem skewed towards the *mature* age range (that above about 50). Again, by years of observation of ARRL publications, their literature shows a distinct emphasis of radiotelegraphy operation over all other allocated modes.⁸

³ Any entity having revenues in excess of 10 million dollars per year can be considered **large**. How large depends on one's skill in interpreting income tax returns and knowledge of tax law.

⁴ From 2003 ARRL federal tax return statement, Attachment II of Form 990 Part V. These 5 paid officers are Mr. David Sumner (executive vice president and secretary), Mr. James McCobb (treasurer), Mr. Barry Shelley (chief financial officer), Mr. Mark Wilson (COO), and Ms Mary Hobart (CDO).

⁵ If ARRL 2002 revenue were 11.5 million but total expenses were 12.3 million, they would seem to be taking an 800 thousand dollar **loss** in 2002. ARRL has survived into 2005 so it can only be surmised that actual revenue is more than what was allowed by law to be stated.

⁶ Based on the biannual *Publisher's Sworn Statement* by ARRL for their monthly magazine's advertising page on their website at <http://www.arrl.org>.

⁷ Obtained from <http://www.hamdata.com> on 3 November 2005, using the *Six Months Ago* tabulation.

⁸ That may seem subjective but the English language is flexible and syntax, grammar may be used to effectively emphasize certain things over others. It is an everyday tactic in advertising media and has been so used for decades to *condition thinking* to products or desires.

4. Technician class licensees who have not taken test element 1 are restricted by present regulation to operate only on amateur bands above 30 MHz. ARRL has not bothered to promote amateur radio operation above 30 MHz except for a monthly column in QST called *The World Above 50 MHz*. By observation, the contents of that column, running continuously since December, 1939, are minuscule and not emphatic about much except long-distance (DX) records. By comparison, the largest United States amateur radio class is the Technician comprising 41.3 percent of all licensees on 3 November 2005. That class is over twice as numerous as the next highest class, General, having 20.3 percent of all licensees.⁹ ARRL has not promoted the activities of Technician class licensees other than that small column each month. By contrast, CQ, the independent amateur radio periodical's parent company, publishes a quarterly magazine devoted entirely to equipment and operation above 50 MHz called *CQ VHF*.¹⁰ Knowledge and news *for* radio amateurs is propagated mostly by print media. Despite the lack of promotion by ARRL, the no-code-test Technician class has been growing steadily since the Commission created it in 1991. A conclusion from all the above is that ARRL and its media is concerned only about Amateur Extra and General classes operating *below* 30 MHz. Its *representation* is only of self-definition considering that membership is only 20 percent..

Discussion

5. On page 1, paragraph 1, ARRL states "*The Commission's Notice in this proceeding does not go far enough.*" This is disingenuous since the Commission is proposing to end *all* morse code testing for license examinations. ARRL proposes to *keep* code testing for the Amateur Extra. The ARRL statement is in reverse; the ARRL and its proposal mirroring their earlier Petition RM-10867 had not *gone far enough*.¹¹

6. On page 3, paragraph 2, ARRL states:

"The *Notice* states the Commission's "belief" that the mere elimination of the Morse telegraphy examination requirement across the board, without more, will: (1) encourage individuals who are interested in communications technology, or who are able to contribute to the advancement of the radio art, to become amateur radio operators."

The Commission's statement, whether the word *belief* is used in quotes or not, is certainly a logical assumption on future actions of the public. ARRL follows this a bit later with the following statement on the Commission's *belief* which is disingenuous *in extremis*:

"As to the first of the Commission's "beliefs," since there is no change in the entry level license class proposed by the *Notice*, and since there is already no Morse

⁹ Figures obtained from hamdata.com for 3 November 2005. Percentages calculated on the basis of a total of 723,641 individual licensees exclusive of *Club* licenses.

¹⁰ *CQ VHF* had been a monthly periodical but was halted due to declining advertising revenue. It has resumed publication as a quarterly based on reader demand. Independent publishers such as CQ obtain all of their revenue through advertising sales; they enjoy no financial backup from an entire membership organization such as the ARRL. Former amateur radio interest publications *Ham Radio* and *73*, both independents, had to cease due to declining advertising sales in 1990 and 2003, respectively.

¹¹ Most of the statements in the ARRL Comment are nearly identical to their RM-10867. RM-10867 is one of 18 earlier Petitions listed by the Commission in NPRM 05-143. RM-10867 was granted *only to the extent specified in the NPRM*.

telegraphy examination requirement for the Technician Class license, there cannot be any incentive created by the proceeding for newcomers to Amateur Radio.”

ARRL is accused of masking their own “belief” that the Extra class must continue to retain morse code testing and **all must enter** amateur radio **in the “entry” class**. In actual fact, there are **no** restrictions on **anyone** of the public from entering amateur radio at **any class...as long as they pass all tests** required by regulations.¹² ARRL is of the opinion that **all entrants** are total beginners to the operation of a radio, a rather absurd position considering that there are thousands of electronics hobbyists in the United States who are **into** many and varied disciplines of electronics; *radio* is just one of many facets of the general field of electronics and no longer some arcane mystery to the general public as they might have been in the 1930s..

7. On page 4, paragraph 2, ARRL states:

“... However, different issues are presented by proposing to eliminate the Morse telegraphy examination for the General Class license on the one hand, and proposing to eliminate the same 5 word-per-minute telegraphy examination for the Amateur Extra Class license on the other. As is discussed below, the Amateur Extra Class license is supposed to represent the ultimate in achievement of both technical and operating skills in Amateur Radio, and a greater justification exist for retaining a minimal telegraphy examination as a legitimate operating skill (among others) for those who would be awarded the highest level license class.”

ARRL’s use of the word *award* is inappropriate and could be considered a *Freudian slip* showing their real opinions. Every amateur radio license is a **grant** by the United States federal government **allowing** a grantee permission to operate. Just because a **test** is associated with the Commission’s regulatory purpose does not mean it is some *honorific, a contest or some academic achievement*. While a “highest-level” amateur radio license may very well be considered as an **award**, that is purely subjective on the part of those using an amateur license class grant for self-promotion, not a part of regulatory law.

8. Continuing the quoted *belief* of ARRL in the preceding paragraph of this Reply, ARRL has not shown any justification for the retention of the code test **now** other than the *belief* that *radiotelegraphy operation* is reserved as a justifier for special rank-status-privilege by Amateur Extra class. If radiotelegraphy operation is considered so important, why doesn’t ARRL consider it so for all other classes? While morse code skill tests do show “legitimate operating skill” levels, morse code mode is only one of many **optional-use** modes. None of the other optional-use modes have ever been given “legitimate operating skill” tests by the Commission. About the only logical assumption one can make is that ARRL wishes to retain *former standards* of rank-status-privilege *earnings* for its core membership. That is not a service to the public.

9. On page 7, paragraph 5, ARRL states:

“The *Notice* in this proceeding does not establish that the Commission is responsive to the needs and interests of the Amateur Service. This is the second time in recent years that the Commission has refused to examine the operating privileges of the various license classes.”

¹² There is no restriction in the current Part 97, Title 47, regulations, no restriction in NPRM 05-143, no restriction from the ARRL’s desire in RM-1087 or any of the other 17 Petitions made in 2003-2004. The colloquial *Extra in a Box*, to enter amateur radio directly as an Amateur Extra through passing all applicable tests once, has been done more than once.

ARRL apparently does not count 18 Petitions and their very fair hearing in each of two comment periods during 2003 and 2004. The 18 Petitions represented very diverse viewpoints and included a large number of *different proposals* of a virtual restructuring of amateur regulations. In those two groups of 18 Petitions there was little in the way of any *consensus in the amateur community*, something the Commission had stated it desired after the WRC-03 was done. The Commission's task of sorting out relevant new conditions must have been prodigious in a total period of what must have been over a year for them. This commenter does not see either failure nor refusal in the Commission's actions since WRC-03, only that 18 Petitions had to be handled equally for the sake of the public.

10. Continuing on ARRL paragraph 5, ARRL states:

“It is timely now to undertake an examination of the operating privileges of the classes of Amateur license, because the entry level license class is demonstrably neither attractive to newcomers nor encouraging in terms of retaining the interest of license holders.”

ARRL is being disingenuous again. ARRL promoted the term *entry level* for the no-code-test Technician class license.¹³ The *original entry level* was the Novice class and so intended from its start. However, the Novice class had not been as “attractive” as some hoped and suffered over a decade of continuously diminishing numbers prior to the FCC 99-412 Report and Order eliminating that class from new licenses after mid-2000. The *new* entry level license now numbers more than 40 percent of *all* licenses, is the largest class of all. That cannot possibly be called *unattractive*. Since the no-code-test Technician class has only been in existence since 1991 yet has climbed to an unquestionable top position in license class numbers in that short time, neither can this *new entry level* class be showing any alleged lack of interest.¹⁴ ARRL is reminded once again that an *entry* into amateur radio can be done at *any class* simply by passing the required class tests. There are no union or guild-like regulation forcing all amateurs to go through a sequence of *apprentice-journeyman-master* skill levels, one level at a time.

11. Does ARRL think that a demonstrated morse code ability is an *absolute* requirement to operate a radio transmitter below 30 MHz?. In remarking about existing regulations of Technician class licensees on Page 8, paragraph 7, and states:

“...the Technician class license is the typical point of entry in Amateur Radio. It offers no HF operating privileges, absent licensing credit for proficiency in Morse telegraphy. [footnote omitted] It does, however, offer HF privileges if the Technician Class licensee passes a five word-per-minute telegraphy examination. [footnote omitted] The Commission's proposal in the *Notice*, if implemented, *actually deletes a simple mechanism for a Technician Class licensee to obtain substantial HF operating privileges.*”

ARRL is being both disingenuous and of using circular logic for its so-called justification. HF operating

¹³ ARRL website and some publications refer to the no-code-test Technician class license as *entry level*. That is shown often enough to not warrant specific pointing-out of such a term. ARRL Comment on page 9, paragraph 8 says that the Technician class is the new entry level.

¹⁴ Some pro-code-test advocates point to the Commission's ruling of old Technician class licensees moved into the (no-code-test) Technician class category if renewed after mid-2000 in the last Restructuring. That is also disingenuous since the Commission's databases tabulated on various websites (such as <http://ah0a.org>) indicate that the no-code-test Technician class had already climbed to a class population top position prior to Restructuring.

privileges are determined by individual administrations. The Commission has not acted to change HF operating privileges for Technicians in any substantial manner since mid-2000, well before the WRC-03 revision of international amateur radio regulations S25. Yes, the Commission must effect some additional changes in amateur radio regulations if they decide to eliminate morse code testing for all classes if the Commission decides to give HF privileges to Technicians. However, that is no reasonable relation to the ARRL statement that the “simple mechanism” [the code test] of existing regulation offers any “substantial” HF operating privileges. Such are quite limited now if the “simple mechanism” has been started.

12. On existing Technician Class licensees, ARRL states on Page 9, paragraph 8:

“The Technician Class license provides very little encouragement to progress and develop technical and operating skills. The second problem is that the entry level Technician Class license examination over overly comprehensive in its subject matter, [footnote omitted] and is therefore a deterrent to newcomers and inadequate as an entry-level license class.”

That is a most strange pair of sentences. The Technician class licensees now number greater than 40 percent of all licensed United States radio amateurs. Apparently it has not “deterred” a continuous growth of that class since it was created in 1991. Statistics on the number of amateur radio licensees show that the total numbers have remained static for better than two years.¹⁵ Had it not been for the newcomers obtaining the no-code-test Technician class licenses, the total license numbers would have been steadily dropping in that time. ARRL repeats that quoted confusing sentence pair “belief” in the middle of paragraph 12, page 12.

13. At the end of paragraph 12, page 12, ARRL states:

“If a newcomer is not offered meaningful entry level privileges, and if the new radio amateur does not get on the air with meaningful operating privileges that will incorporate him or her in the mainstream of Amateur Radio operating (which necessarily includes HF operation), ARRL’s experience and its survey results clearly establish that (1) the newcomer will be dissuaded from becoming licensed, and (2) a Technician Class licensee is not given adequate incentive to become involved in Amateur Radio or to progress.”

Other than a rather tortuously worded long sentence, ARRL has not made itself clear. The *survey* referred to there and often within ARRL’s Comment is not shown as an attachment. Considering the number of conclusions cited as a result of that survey, ARRL should have included more information to back up their claims.¹⁶ No contracted survey is necessary for a clear observation of extreme polarization among *coders* versus *no-coders* among United States radio amateurs on the HF bands longer than the last decade. The Commission can see for themselves the already-deep division in viewpoints in Comments on WT Docket 05-235. This division of an almost ideology viz a viz morse code can only be soothed by the amateur media. Even if done, it will take years to smooth over. The unfortunate thing is that the polarization has already been spread

¹⁵ www.hamdata.com tabulations include month-ago, six-months-ago, one-year-ago, and two-years-ago class and total numbers. They also track the number of new, never-before-had licensees and expirations; expirations are very slightly larger than newcomers’ numbers.

¹⁶ Commissioned surveys can be tailored to elicit information for the contractor in its results. This is an unfortunate common practice which has been going on for over four decades in the United States in all fields of endeavor. The only proper way to ascertain true objectivity in results is to see and examine the survey questions themselves.

by the ARRL conditioning their thinking for years that morse code ability was the epitome of amateur radio operating skills. ARRL must recognize they are part of the problem before attempting to solve it.

14. ARRL proposes a detailed HF bandplan for future Technician class licensees in paragraph 15, page 14. What that is little more than unenforceable cluttering of regulations' content and a subtle form of ghetto in bandspace for the *lesser class*. Can the Commission adequately enforce the power output limits given among a rough estimate of 200,000 Technicians in the near future? Further, the little slices of spectrum appear little more than a token sop to Technicians of that future. It is akin to allowing them into the radio pool but forcing them to stay in one corner away from the *good swimmers* who must not be disturbed. If the ARRL is serious about giving Technicians of that future *true* incentives, not a small tantalizing *carrot-on-a-stick* baiting.

15. ARRL argues to retain the radiotelegraphy test for the Amateur Extra class by their statements in paragraph 16, page 15:

“The Extra Class license is quite successful in its current form, and the number of radio amateurs who have achieved that ultimate license class clearly demonstrates that a 5 word-per-minute telegraphy requirement is not a significant deterrent to those who aspire to it. The Amateur Extra Class license represents the demonstration of the highest level of achievement in Amateur Radio.”

ARRL's first sentence quoted is a refined-language version of the colloquial phrase “if it ain't broke, don't fix it.” In other words, do not argue the status quo, especially those who had achieved Extra under the former 20 word-per-minute code test rate prior to the 2000 Restructuring changes. The argument for the second sentence is based on the artificiality of regulation evolution; there was once a desire by lobbyist groups to *create* this *highest-level* rank-status-privilege class and thus it came to be. Self-promotion by a minority is *not* serving the public interest. In context and by implication, ARRL seeks to retain telegraphy skills over and above any other skill whatsoever to allegedly define the rank-status-privilege of the Amateur Extra class. As-is, ARRL's statements appear to be sophistry praising those in their core membership.

16. ARRL continues the sophistry in paragraph 16, page 15, by stating:

“Morse telegraphy, the only manual operating skill that exists in Amateur Radio, [footnote 13] is an element of communications ability that should be included in the portfolio of operating skills demonstrated by the most accomplished radio amateurs.”

ARRL footnote 13 attempts to explain their claim by the following:

“...[the Commission] argument fails, however, because the Commission requires, for the Amateur Extra Class license, demonstration of ability in numerous types of communications operating technologies, none of which are ‘required’ for use by the Commission. They simply happen to not involve manual operator skills. The Commission does not, for example, require that radio amateurs utilize television or facsimile, but the Extra Class license examination question pool includes questions on those and other operating techniques. Morse telegraphy is but one specialized operating technique, but proficiency in that operating technique is demonstrated manually, rather than by written examination.”

ARRL should realize that argument *applies equally to all other classes* yet they single out Extras. The Commission allows *all amateurs* to utilize telegraphy where allocated in amateur frequencies at *their option*

whether or not those amateurs had passed any telegraphy test. ARRL should note that the only exclusive radiotelegraphy allocations are at the lower-frequency end of the amateur 6 and 2 meter bands which are *open to optional use by all three current license classes.* ARRL's justification for their "belief" in the supremacy of rank-status-privilege through manual radiotelegraphy skills is not demonstrated for the Amateur Extra class. It would be valid only if *all license classes* were required to operate by radiotelegraphy over and above any other mode of operating.

17. ARRL ends their paragraph 16 justification for retention of Amateur Extra code testing as follows:

"The Amateur Extra Class license has traditionally focused heavily, and indeed almost exclusively, on specialized operating techniques. This is the proper focus of that highest license class. The examination should also include a minimal demonstration of Morse telegraphy, which remains a useful, often-used, and extremely popular means of domestic and international Amateur Radio communications. Retaining Morse telegraphy as a requirement for only the Amateur Extra Class license, in ARRL's view, places Morse telegraphy in a proper, balanced perspective."

ARRL is again disingenuous and actually argues against itself. If the Amateur Extra class is supposed to be the *highest achievement* then it should, logically, show skills on *all parts* of amateur radio rather than favoring *some* specialized arts. If radiotelegraphy operation is *often-used, and extremely popular*, then it *cannot* be said to be *specialized*. ARRL contradicts itself in addition to *not justifying* its *belief* in the *proper focus*. ARRL's use of *extremely* in popularity is a misused superlative conditional on the basis of their own past poll statement in the media that radiotelegraphy on HF amateur bands was *second* to voice communications via single-sideband AM. *Proper, balanced perspective* is not achieved by favoring a singular operating mode nor requiring retention of a singular operating skill test for the so-called *highest-level* license class.

18. In the ARRL Conclusions, paragraph 17, page 16, it is begun by stating:

"The instant *Notice* proposal frankly does not address the current needs and interests of the Amateur [radio] Service."

That is an outright falsehood. ARRL, as a private membership organization representing only a minority of the amateur radio service licensees, is neither proper judge nor true representative of the public. It should be obvious to anyone reading all Comments on WT Docket 05-235 that there is polarization on the issue of telegraphy testing on the part of the responding public. That polarization is nearly evenly divided and was in favor of telegraphy testing elimination early in the comment period, slightly in favor of telegraphy testing retention at the end of the comment period.¹⁷ Considering the general statistics of the comments in WT Docket 05-235 plus the great differences of opinion contained in the 18 Petitions of 2003 to 2004, the Commission has a herculean task of determining the *current needs and interests of the amateur radio service*. ARRL, as a minority representative of traditionalist views favoring radiotelegraphy within amateur radio, is not a true judge of *public* desires.

¹⁷ What is confusing to the public is the fact that the Notice was open for comment, and first used by the public on 20 July 2005. However, the Federal Register statement of the Notice being open did not occur until 31 August 2005. The public has not been aware of whether or not the Commission will accept comments made prior to 31 August 2005. That question had been included in this commenter's private tabulation, included as an attachment to a Reply to Comments of 30 October 2005 and showing daily tallies up to and including 28 October. Near-daily postings showing the current status of comments' general opinion were made by this commenter on Internet newsgroup rec.radio.amateur.policy through www.google.com beginning 2 August 2005.

19. Again, in ARRL Conclusions, paragraph 17, pages 16 through 17, is the statement:

“The elimination of Morse telegraphy, absent a more thorough review of operating privileges in the Amateur Service, will not address the ascertained flaws in the only entry level license class. That license class is not attracting or keeping newcomers in its present configuration, and it needs fixing right now.”

To reiterate, ARRL is reminded of the continuous growth of the Technician class since its creation in 1991 and now achieving the obvious top rank in license class population of greater than 40 percent of all licensed United States radio amateurs. Also, anyone may *enter* United States amateur radio at *any class* by the simple expedient of passing all the required tests. That newcomers to amateur radio of today and the past two years chose to enter amateur radio at the Technician class level is rather obviously due to no required telegraphy test. ARRL may continue to call Technician class an *entry level* but it clearly overlooks the negative opinion on telegraphy mode by so many of those *entrants*. Those *entrants* are as much a part of the *public* as members of ARRL.

20. Directly following the ARRL quote above, on page 17, ARRL states:

“The Technician Class license is as it is for historical reasons, not as the result of planning. The operating privileges, which were never intended originally to serve as proper entry level license privileges, is isolationist as a practical matter in its treatment of newcomers.”

ARRL is stubborn in implicative contention that Technician class license was an *entry level*. When created in 1991, the Technician class was a *separate class* for those who did *not* want to consider radiotelegraphy as a required, tested skill. It was never *planned* to be an *entry level* 14 years ago. In 1991 the already-long-in-place *Novice class* was considered an entry level by all, including ARRL in all their media statements. ARRL keeps on overlooking *public desires* that do not favor radiotelegraphy. Given that Technician class licensees were forbidden by regulations to operate below 30 MHz, ARRL is quite right in saying that was *isolationist as a practical matter*. However, that *isolationism* was in operating frequency privileges, a requirement of International Telecommunications Union Radio Regulations at the time. That the Technician class license did, indeed, become a de facto entry-level class is due to two things: The code-tested Novice class licensee numbers began falling and continued to fall; the no-code-test Technician class license was much more attractive to the public *despite* the operating frequency limitations. As to *treatment of newcomers*, ARRL should look to its own media and observe that it does not do much in support of or to encourage a class that is currently 41.3 percent of all licensed United States radio amateurs.¹⁸

¹⁸ Data from www.hamdata.com obtained on 3 November 2005. Together, the Technician and Technician Plus class licensees number 351,737. Based on 723,641 total individual amateur radio licensees (exclusive of 9,746 club licenses), those two classes make up 48.6 percent of United States amateur radio licensees. ARRL has much in their media in regards to selling publications and products for *upgrading* [a license class] or of entering amateur radio. Conspicuous is their organization officers' lack of rank of anyone with those two classes that are approaching a majority of all licensees.

Summary

ARRL is a large private organization that is also in business of selling publications and products on a large, money-making scale, all related to amateur radio. ARRL has attempted to re-introduce their Petition RM-10867 and insists on retention of the telegraphy test for the Amateur Extra class without making a convincing case for such retention. ARRL has over-emphasized the Technician class examination as allegedly creating little interest to the public yet fails to realize the growth of that class to the most populous position that is twice as large as the next-higher class. ARRL has continually emphasized radiotelegraphy over all other allocated amateur radio modes; their officers and membership are inclined to favor the higher-class licensees. ARRL has not yet attained any percentage close to a majority among licensed United States radio amateurs, yet alleges it represents all of amateur radio in this nation. ARRL has charged that the Commission has failed to act on any changes since WRC-03 yet does not mention the long and strong comment and debate over a total of 18 Petitions during years 2003 and 2004. Should the Commission decide to eliminate telegraphy testing as indicated in NPRM 05-143, the necessary regulation changes can be implemented in a reasonably swift manner. ARRL offers no easy solution to benefit the public. ARRL attempts to satisfy only their own beliefs and their core membership, a minority group.

Based on the twenty items discussed and comment on them, this commenter would urge the Commission to ignore ARRL desires as having no advantages for the public in regards to amateur radio. The public deserves reasonable options to all, not just one minority group. Option is no failure.

A Thank You

This commenter wishes to thank the Commission for permitting a private citizen of the United States, one who holds no amateur radio license, has no affiliation with any amateur radio membership groups, yet has long experience in radio communications and electronics design as well as being a very long-time hobbyist in electronics to comment on regulations specifically governing getting into United States amateur radio.

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