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 Exhibit

Submitted electronically on 25 November 2005 by:

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91352-4236

General

This Reply to Comments is essentially an Exhibit of the nature and contents of WT Docket 05-235 concerning NPRM 05-143, intended for general information to all, including the Commission.. It is a retrospective on its existence and a small window into the observed opinions of those interested in United States amateur radio licensing. It does not seek to show favoritism in radio modes. Since the matter of morse code testing for an amateur radio license has been such a contested issue in amateur radio for so long, a proposed rule making on its elimination can be considered as significant in United States amateur radio regulations for both near and far future of amateur radio.

Discussion

NPRM 05-143

1. Notice of Proposed Rule Making 05-143 was released to public view on 19 July 2005.[1] The first public Comments, three in all, appeared in the Electronic Comment Filing System (ECFS) under WT Docket 05-235 on 20 July 2005. A copy of the NPRM itself appeared in the ECFS on 21 July, stamped *Received Inspected* as of 20 July *by FCC Mailroom* but logged into the ECFS under 15 July 2005. July 15 is the adoption date on the heading of the NPRM document.

[1] The word ***public*** is taken to mean all citizens, the *public* of the United States, those most affected by laws and regulations of the United States. First indication of its presence was on several amateur radio websites..

2. In the heading of the NPRM 05-143 document are the words *Comment Date: 60 Days from publishing in the Federal Register* and, just below it, *Reply to Comments Date: 75 Days from publishing in the Federal Register*. Normally the Commission will have the Federal Register publish a document within a few days of public notice of its existence. In the case of NPRM 05-143 the elapsed time between first public notice and publishing was ***over six weeks*** or, exactly, ***43 calender days*** until it was published in the Federal Register. On the 31st of August 2005, the publishing date, the Comment ending date was stated as 31 October 2005 and Replies to Comment ending date was stated as 14 November 2005.[2]

3. The six-week delay between public revelation and legal notice in the Federal Register creates an obstacle in determining the opinion of the public on the singular NPRM subject.[3] It can be assumed that most interested parties in regard to amateur radio regulations do not have subscriptions to the Federal Register nor maintain a constant vigil at the Federal Register website table of contents page; most would rightly expect only a few days delay between first notice and legal publishing as in the past history. That being the case, interested parties willing to comment would file their comments and await official word on decisions made after the last official end date. They would not be inclined to linger daily, checking for the publishing notice, since they would assume such would have come quickly.

4. A total of 3,786 filings have been made in WT Docket 05-235 from 15 July 2005 through 14 November 2005.[4] Of those 1,982 or 52.35 percent of 3,786 were filed *prior* to 31 August 2005. This raises a question in the public's mind if the Commission will consider over half of all filings as to determining a decision on the NPRM or discard them because they were done prior to the *official start date*? If that more-than-half of all, reflecting the opinions of some of the public is discarded, it would seem that the Commission is not acting as well as it could for ***all*** the public.

5. The code test issue is a significant one and a highly polarized subject to those interested in radio and licensing. Those more interested than others would, and generally did, file quickly to express their opinions. It would be unacceptable to consider that they would keep checking for over six weeks to see if their opinion was discounted for being *unofficial*; they would naturally assume that their filed comments were valid and continue with their regular tasks.

A Viewport Into The Opinions Of The Public

6. Table 1 following indicates a running percentage of filings who were unambiguously in favor of the NPRM. Determining factor for percentages are the cumulative totals of filings up to the end of the date period given. Date period endings correspond approximately to one-week intervals.[5] Table 1 also shows the running

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[2] Specific date periods were not, still aren't in the ECFS copy of NPRM 05-143.

[3] The singular subject of NPRM 05-143 is the proposed elimination of the morse code test, test element 1, for all classes of amateur radio licenses.

[4] Numerical values are from a personal worksheet updated daily and constantly rechecked on accuracy of totals to numeric values given in the ECFS Search Result Set. This worksheet is attached to this Exhibit as Appendix 1.

[5] ECFS was not generally fully opened on weekends and some work weeks were shortened due to holidays. Some electronic filings were entered during weekends, although that was relatively rare.

percentage of *Indeterminate* filings for the same ending periods. Indeterminate is defined as filings which were in the following categories: Obviously joking; verbatim duplicates of previous filings, short duplicate filings by the same individual which, though reworded, contained essentially the same opinion as previous filings; foreign residents (two); filings that did not address the NPRM itself; filings which did not relate to amateur radio regulations whatsoever. The Indeterminate category included an English Department instructor who did not have any personal interest in amateur radio but did not include friends or family indicated as having the same postal address.[6] Neither did it include 18 filings from law students not indicating any personal interest in amateur radio but may have been practicing a practical class exercise.[7]

Table 1
Cumulative Percentage of Filings For NPRM and Percentage of Indeterminate Filings Taken Over The Calender Period 15 July to 31 October, 2005

Period Ending	Percentage FOR NPRM	Percentage Indeterminate
22 July	63.6	6.8
29 July	63.9	7.6
5 August	60.6	3.8
12 August	57.1	5.1
19 August	57.3	5.4
26 August	56.2	5.6
4 September	55.0	5.8
10 September	54.7	6.1
17 September	54.5	6.1
23 September	54.5	6.2
30 September	54.5	6.2
7 October	54.6	6.3
14 October	54.4	6.3
21 October	54.2	6.5
28 October	51.2	6.4
31 October	49.3	6.5

7. Numeric values for Table 1 were based on the numeric values given in Appendix 1. While this writer used

[6] On 4 October 2005, Ms Ellen H. Wall, *City College of San Francisco English Department*, filed against the NPRM in desiring morse code as an alternate communications means to enhance general linguistics and aid the handicapped. She indicated no personal interest in amateur radio nor any affiliation with it.

[7] The *class exercise* remark is an assumption by this writer based on the explanatory remarks of the students and the fact that all were in the ECFS as filed on 31 October 2005. There are actually 20 such students involved but 3 are unidentified by name and are lumped together as one filing, that one *et al* copy in the ECFS considered as indeterminate. Since the opinions varied, it had the resemblance of a law school *moot court* exercise. While they had no stated direct connection or involvement with amateur radio, the other 17 filings were not considered indeterminate under the consideration that they might, in the future, become attorneys involved in communications law specialties. While not germane to the subject before the Commission and perhaps a bit misusing of public resources for school practice, the 17 identified-individual filings had the appearance of being correctly researched and referenced.

four categories for filings' opinions in Appendix 1, Table 1 has only one: For the NPRM. All other filings could safely be taken as only *partially for* the NPRM (retention of code testing for *highest class* license) or unambiguously against the NPRM. Percentages were based on date period cumulative filing totals minus Indeterminate filings.

8. While the percentages for the NPRM are above 55 percent prior to the period ending 26 August, they drop to 51 percent by period ending 28 October, falling to 49 percent after the 461-filing crush of 31 October 2005. This seems to indicate that the general opinion is split almost halfway after 3,706 filings made as of 31 October 2005.[8] There is no clear-cut indication that a majority opinion exists either for or against the NPRM, based on the first 3 ½ months of existence of WT Docket 05-235.

9. Table 2 shows essentially the same as Table 1 except the tabulating period is 31 August to 31 October, the stated dates for Comments given in the Federal Register publishing on 31 August 2005. The percentages are very roughly 10 points lower than those of Table 1. There is no reasonable explanation for this, especially considering that ***fewer*** filings were made in the *official period* compared to the *unofficial period* of 15 July through 30 August, 2005.[9]

Table 2
Cumulative Percentage of Filings For NPRM and Percentage of Indeterminate Filings Taken Over The Calendar Period 31 August to 31 October, 2005

Period Ending	Percentage FOR NPRM	Percentage Indeterminate
4 September	45.8	7.4
10 September	44.9	8.7
17 September	45.2	8.4
23 September	45.7	8.4
30 September	46.1	8.6
7 October	46.9	8.7
14 October	46.6	8.4
21 October	45.6	9.0
28 October	41.1	7.5
31 October	42.0	7.4

10. Some possible explanations surface. With six weeks between public release and publishing in the Federal Register, those eagerly awaiting the NPRM responded quickly and favorably to it. That raised the percentages for the NPRM in the first few weeks. Once publishing had been done, those disfavoring the NPRM finally made themselves known. Given the *Extra-Only* option as in the American Radio Relay League (ARRL)

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[8] www.hamdata.com for 24 November 2005 yields information that there were 724,728 individual United States amateur radio licensees (not counting 9,771 club calls) on that date. If all of the 3,705 filings (less the first filing, that of the NPRM) were separate individuals and all licensed in the amateur radio service, those filings represent only 0.51 percent of the so-called amateur community. Since they are not and represent both licensed and unlicenced individuals, the amateur community sampling is much less.

[9] With reference to numeric data in Appendix 1, there were 1,982 *unofficial* filings made prior to 31 August and there were 1,724 *official* filings from 31 August to 31 October, 2005.

Petition, plus the increase in that category as seen in Appendix 1, those loyal to the ARRL could have pressed home a necessity to comment for some of, but not all of the NPRM. There may have been some *booster* work for the Extra-Only category comments in other than Internet public commentary on the NPRM. There was no such drive to comment done by the No Code International organization to boost the NPRM other than a single notice on their home webpage.[10] Following that initial six week period, those who had filed then did not generally file a second time once the NPRM was published in the Federal Register[11]; those may have thought their single filings were official enough regardless of being done prior to publishing, or they may have thought it improper to file a second time. There is no evidence of what their decisions were, if any were considered..

11. Replies to Comments filings were considered as valid opinions in Appendix 1 for or against the NPRM. Since WT Docket 05-235 was neither a vote nor a simple for-against opinion poll, plus the filed reasoning to keep or delete the code test were many and numerous, caused them to be included in counting and not categorized as *duplicates* or *indeterminate*.[12] There were only 62 filings in WT Docket 05-235 which were marked specifically as Replies to Comments. Of those, one was filed on 15 November 2005, one day after the last day of all comments. 32 filings were done from 1 November to 14 November, the only such filings which would have been considered as *official* in that time period. That left 29 Replies to Comments which were in the docket through 31 October 2005. The percentage of 29 Replies to the overall filings total of 3,706 is only 0.78 percent.

12. A category which could cause some upset of percentages for or against the NPRM is the *Extra-Only* where those commenters desired a code test for the *highest-class* license examination, but consider it correct to remove the code test from *lower-class* license examinations. That is difficult to categorize since, on one hand, they agree with the NPRM in removing the code test for some, but on the other hand, they are against the NPRM on retaining the code test for one class. The filings in that *Extra-Only* category are numerous enough to shift the *For* category much higher if they are considered solely on removing the code test. In Appendix 1 they are considered as *Against* the NPRM due the duality of the *Extra-Only* opinion. As of 24 November 2005, the *highest-class* amateur license is the Amateur Extra but has only 15.20 percent of the total number of United States amateur radio licenses.[13]

13. Had the *Extra-Only* category been interpreted as being *for* the NPRM, then Table 1 would have shown ***67.1 percent in favor*** of the NPRM on 31 October.[14] Similarly, Table 2 would have shown ***63.4 percent in favor*** of the NPRM on the same date. A more realistic percentage would be less than that, but still higher than

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[10] www.nocode.org No Code International is an organization devoted to eliminating the morse code test from amateur radio license exams worldwide. That organization has stated it will disband when task is done.

[11] The cases of single duplicate filings appear to be about the same before and after the publish date of 31 August. Those who were making multiple duplicate filings did so before and after 31 August.

[12] Mr. Joseph Speroni, at www.ah0a.org, discarded all Replies to Comments in his analysis of filings on WT Docket 05-235 in addition to making the NPRM into a count *for* or *against morse code* rather than for or against the NPRM. He also included a non-amateur, inexperienced-in-any-radio-activity English instructor as being *for* morse code testing in United States amateur radio licensing.

[13] From www.hamdata.com as cited before.

[14] Some of the *Extra-Only* category commentary vacillate on stated opinions wherein they deem it acceptable if the NPRM entire is made regulation, but *desire* to retain a morse code test in some manner. Others in the same category are firm in retention of the code test for *highest-class* license. Considering that this would mean re-reading all those comments in that category in order to properly re-categorize them in numbers, this effort was dropped for the time being.

indicated on Tables 1 and 2 for 31 October 2005.

14. In the Reply to Comments *Only* period of 1 November to 14 November, 2005, the opinions are quite strong in favor of the NPRM. This is seen in Table 3. However, the total number of filings in this period is only 80 over 9 days. Of those 80, 48 are not Replies to Comments and would therefore be *unofficial*[15]. That left only 32 *official* filings. Of those, 25 or 78.1 percent of 32 total were for the NPRM.

Table 3
Filings Made During Period 1 November to 14 November, 2005

		Official*		
Day	**Unofficial***	**Duplicate**	**For NPRM**	**Against NPRM**
1 Nov	10	0	3	0
2 Nov	9	0	1	0
3 Nov	4	0	0	0
4 Nov	4	0	1	0
7 Nov	11	0	5	0
8 Nov	1	0	1	0
9 Nov	1	0	4	0
10 Nov	3	0	1	0
14 Nov	5	1	9	6
Totals	**48**	**1**	**25**	**6**

* Replies to Comments, as noted in ECFS, are considered *official*, all others *unofficial*.

15. To 23 November 2005 there were only 9 comments filed on WT Docket 05-235. On 15 November one of those filed was a Reply to Comments. All are considered as *unofficial* since the published ending date in the Federal Register was exceeded.

A Comment On The Increase Of Internet Communications With The Commission

16. Of the 3,795 filings on WT Docket 05-235 through 23 November 2005, only 85 filings were marked as *Letters*, visible on the ECFS as digitized image copies of original correspondence.[16] That would indicate that 3,709 filings were done *electronically* via the Internet.[17] The Letters filings constitute only 2.2 percent of the

[15] Terms *official* and *unofficial* are relative to the presupposed Commission's use in decision-making on the opinions of the public as stated in the comment periods published in the Federal Register.

[16] There is some observed variation in filing notations on the ECFS wherein the *type* of filing does not agree with the observed filing over the ECFS. To save personal time, the *Search* feature of the ECFS was utilized to obtain a comparison of *Letters* versus all other types.

[17] The first, or earliest, filing on WT Docket 05-235 is a copy of NPRM 05-143. Viewers of the ECFS can only observe the additional time-date stamp imprint to presume it entered the ECFS from a paper original, therefore it is considered an additional written *Letter* to the 85 marked as such in the ECFS Result Set..

total. By comparison, the number of filings on WT Docket 98-143 were compared with WT Docket 05-235.[18] Using the ECFS, the total number of filings on WT Docket were 98-143 were 2,287 between 16 February 1998 and 15 January 1999. Of those 2,287, 15 were indicated as concerning Petitions RM-4148 or RM-4196, leaving 2,272 as being marked specifically for WT Docket 98-143.[19] Of those 2,272, 238 were marked as *Letters* and constituted 10.4 percent of the total. The number of written filings on WT Docket 05-235 are about a third of those on WT Docket 98-143 while the total filings are nearly twice as many.[20] WT Docket 98-143 had an average of about 206 filings per month; WT Docket 05-235 has had an average of about 949 filings per month. Electronic access to the Commission in 2005 has quadrupled for individuals of the public as compared to seven years ago.

17. In the comparison of Docket filings to WT Docket 98-143, it was observed that the Commission shows 303 total filings made after the last ending date of 15 January 1999. The latest filing on Docket 98-143 occurred on 5 August 2005. That one was filed approximately 6 ½ years after the comment end date and approximately 4 ½ years after the termination of proceedings on 98-143.[21] While allowing the ECFS to *show all* filed documents serves the public, this writer has some strong questions on the advisability of being able to file *new* documents by the public after the Commission has terminated a proceeding by an Order. It is respectfully suggested to the Commission that this be considered as a procedural change for the future.

A Summary

18. There has been no statement from the Commission on the 6-week delay between public release of NPRM 05-143 and its publishing in the Federal Register. There has been no statement from the Commission on whether or not it will consider the 52 percent of all Comments filed during that 6-week delay. It would be a service to the public by the Commission if this delay and if the Commission will consider that large group of Comments to be considered in its final decision.

19. In the examination of all filings on WT Docket 05-235, the general inference from the 3,795 filings is that the public is approximately evenly split between elimination of test element 1, the morse code test, and its retention, either whole or in part. That general inference is still variable dependent on whether or not the filings made during the 6-week delay to Federal Register publishing is considered for a final decision. Dockets are not *votes* or some simple *opinion poll* as has been suggested by some of the public. It is now up to the Commission for that final decision to an Order as considered best for *all the public*, not one opinion group.

20. Electronic filing of Docket comments has proven to be a success over the last 7 years, a good service to the public. Some slight procedural changes to proceedings' new filings are suggested to reduce the need and size of document bases in the future.

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[18] WT Docket 98-143 had the comments on the *Restructuring* issue which eventually resulted in FCC 99-412, the Report and Order which established the actual Restructuring that was effective in mid-2000. The comment period on WT Docket 98-143 was extended twice with the final date being 15 January 1999.

[19] The Petitions and any filings thereto are not available for viewing on-line of the ECFS.

[20] The comment time period of WT Docket 98-143 was about 11 months. The comment time period of WT Docket 05-235 is only about 4 months to date.

[21] Memorandum Opinion and Order FCC 01-103, 6 April 2001.

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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General Radiotelephone (Commercial) Radio Operator license transferred from a First Class Radiotelephone (Commercial) Radio Operator License first obtained in March, 1956 and kept renewed.
Former contributor to and then Associate Editor at *Ham Radio* magazine prior to 1990.

APPENDIX 1

FILINGS on WT Docket 05-235 as of 23 Nov 05, Beginning* 20 Jul 05:

Date	TOTAL	Indeterminate	Against	FOR	Extra Only	
15 Jul	1	-	-	1	-	
20 Jul	3	-	-	3	-	
21 Jul	28	-	10	17	1	
22 Jul	27	4	8	14	1	
	(59)	(4)	(18)	(35)	(2)	sub-total
25 Jul	92	9	20	54	9	
26 Jul	12	-	1	11	-	
27 Jul	7	-	2	2	3	
28 Jul	11	-	2	8	1	
29 Jul	17	2	7	7	1	
	(198)	(15)	(50)	(117)	(16)	sub-total
1 Aug	116	-	31	78	7	
2 Aug	143	6	36	83	18	
3 Aug	129	2	31	73	23	
4 Aug	90	3	27	52	8	
5 Aug	84	3	30	40	11	
	(760)	(29)	(205)	(443)	(83)	sub-total
8 Aug	459	34	136	221	68	
9 Aug	101	3	34	45	19	
10 Aug	51	3	14	29	5	
11 Aug	49	1	9	32	7	
12 Aug	39	5	5	20	9	
	(1459)	(75)	(403)	(790)	(191)	sub-total
15 Aug	158	8	42	81	27	
16 Aug	34	1	9	19	5	
17 Aug	33	3	5	20	6	
18 Aug	46	7	6	27	6	
19 Aug	27	1	9	15	2	
	(1757)	(95)	(474)	(952)	(236)	sub-total
22 Aug	116	11	33	52	20	
23 Aug	20	2	10	6	2	
24 Aug	18	-	9	7	2	
25 Aug	9	-	4	4	1	
26 Aug	11	-	5	3	3	
	(1931)	(108)	(535)	(1024)	(264)	sub-total
29 Aug	45	3	21	12	9	
30 Aug	6	1	2	2	1	
31 Aug	57	4	19	30	4	
1 Sep	82	3	26	33	20	
2 Sep	57	8	12	25	12	
3 Sep	4	-	2	2	-	
4 Sep	3	-	-	3	-	
	(2185)	(127)	(617)	(1131)	(310)	sub-total

6 Sep	64	6	19	29	10	
7 Sep	11	2	3	5	1	
8 Sep	16	2	6	5	3	
9 Sep	15	2	4	6	3	
10 Sep	3	-	1	2	-	
	(2294)	(139)	(650)	(1178)	(327)	sub-total
12 Sep	24	1	7	12	4	
13 Sep	18	-	5	9	4	
14 Sep	11	1	3	5	2	
15 Sep	15	3	3	5	4	
16 Sep	13	1	4	7	1	
17 Sep	1	-	1	-	-	
	(2376)	(145)	(673)	(1216)	(342)	sub-total
19 Sep	30	1	12	16	1	
20 Sep	10	2	4	2	2	
21 Sep	10	-	3	7	-	
22 Sep	12	2	5	4	1	
23 Sep	8	1	2	5	-	
	(2446)	(151)	(699)	(1250)	(346)	sub-total
26 Sep	19	2	3	10	4	
27 Sep	7	-	1	5	1	
28 Sep	3	1	-	1	1	
29 Sep	4	-	2	1	1	
30 Sep	6	1	-	3	2	
	(2485)	(155)	(705)	(1270)	(355)	sub-total
3 Oct	21	2	8	9	2	
4 Oct	11	1	3	7	-	
5 Oct	7	1	1	3	2	
6 Oct	6	-	1	5	-	
7 Oct	4	1	-	3	-	
	(2534)	(160)	(718)	(1297)	(359)	sub-total
11 Oct	31	1	13	13	4	
12 Oct	9	1	3	3	2	
13 Oct	6	-	2	3	1	
14 Oct	10	1	3	5	1	
	(2590)	(163)	(739)	(1321)	(367)	sub-total
17 Oct	24	4	4	11	5	
18 Oct	12	4	4	2	2	
19 Oct	6	1	2	2	1	
20 Oct	15	1	3	7	4	
21 Oct	11	-	5	3	3	
	(2658)	(173)	(757)	(1346)	(382)	sub-total
24 Oct	27	2	7	11	7	
25 Oct	217	6	92	79	40	
26 Oct	204	14	61	76	53	
27 Oct	73	4	23	23	23	
28 Oct	66	8	26	21	11	
	(3245)	(207)	(966)	(1556)	(516)	sub-total

31 Oct	461	33	176	153	99	
Total	3706	240	1142	1709	615	
percent	[of 3466]	-	32.95	49.31	17.74	

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Official Comment Period, 31 August 2005 to 31 October 2005 **

31 Aug	57	4	19	30	4	
1 Sep	82	3	26	33	20	
2 Sep	57	8	12	25	12	
3 Sep	4	-	2	2	-	
4 Sep	3	-	-	3	-	
	(203)	(15)	(59)	(93)	(36)	sub-total
6 Sep	64	6	19	29	10	
7 Sep	11	2	3	5	1	
8 Sep	16	2	6	5	3	
9 Sep	15	2	4	6	3	
10 Sep	3	-	1	2	-	
	(312)	(27)	(92)	(140)	(53)	sub-total
12 Sep	24	1	7	12	4	
13 Sep	18	-	5	9	4	
14 Sep	11	1	3	5	2	
15 Sep	15	3	3	5	4	
16 Sep	13	1	4	7	1	
17 Sep	1	-	1	-	-	
	(394)	(33)	(115)	(178)	(68)	sub-total
19 Sep	30	1	12	16	1	
20 Sep	10	2	4	2	2	
21 Sep	10	-	3	7	-	
22 Sep	12	2	5	4	1	
23 Sep	8	1	2	5	-	
	(464)	(39)	(141)	(212)	(72)	sub-total
26 Sep	19	2	3	10	4	
27 Sep	7	-	1	5	1	
28 Sep	3	1	-	1	1	
29 Sep	4	-	2	1	1	
30 Sep	6	1	-	3	2	
	(503)	(43)	(147)	(232)	(81)	sub-total
3 Oct	21	2	8	9	2	
4 Oct	11	1	3	7	-	
5 Oct	7	1	1	3	2	
6 Oct	6	-	1	5	-	
7 Oct	4	1	-	3	-	
	(552)	(48)	(160)	(259)	(85)	sub-total
11 Oct	31	1	13	13	4	
12 Oct	9	1	3	3	2	
13 Oct	6	-	2	3	1	
14 Oct	10	1	3	5	1	

	(608)	(51)	(181)	(283)	(93)	sub-total
17 Oct	24	4	4	11	5	
18 Oct	12	4	4	2	2	
19 Oct	6	1	2	2	1	
20 Oct	15	1	3	7	4	
21 Oct	11	-	5	3	3	
	(676)	(61)	(199)	(308)	(108)	sub-total
24 Oct	27	2	7	11	7	
25 Oct	217	6	92	79	40	
26 Oct	204	14	61	76	53	
27 Oct	73	4	23	23	23	
28 Oct	66	8	26	21	11	
	(1262)	(95)	(407)	(518)	(242)	sub-total
31 Oct	461	33	176	153	99	
Total	1724	128	584	671	341	
percent	[of 1596]	-	36.59	42.04	21.37	

** Official Comment period as stated in Federal Register of 31 Aug 05

* NPRM FCC 05-143 as in the ECFS on 15 Jul 05, counted as "For."

Notes:

Indeterminate column has duplicates by same individual, joke entries, comments not having anything to do with NPRM, comments on matters other than amateur radio.

Against column are those who are unambiguously against removing any form of code testing.

FOR column are those who are unambiguously for the NPRM and removal of code testing, all classes.

Extra-Only column has those who wish to retain code test for "highest class" (Extra) but allow deletion of code test for "lower" classes.

Percentages are calculated based on Totals minus Indeterminate entries.

Replies to Comments period filings, 1 November to 14 November

	Per Day	Unofficial, NOT Reply to Comments	OFFICIAL total	dupe	FOR	Against
1 Nov	13	10	3	-	3	-
2 Nov	10	9	1	-	1	-
3 Nov	4	4	-	-	-	-
4 Nov	5	4	1	-	1	-
7 Nov	16	11	5	-	5	-
8 Nov	2	1	1	-	1	-
9 Nov	5	1	4	-	4	-
10 Nov	4	3	1	-	1	-
14 Nov	21	5	16	1	9	6
Totals	80	48	32	1	25	6

Notes: "NOT Reply to Comments" based on notations in ECFS Search Results tabulations AND not a surface-mail delivered letter indicating it is a Reply to any Comments. All those under the four OFFICIAL columns are marked in ECFS Search as "RC" or Reply to Comments.

"FOR" and "Against" columns indicate opinion about NPRM with "Against" meaning desire to retain all or some code testing; i.e., against NPRM.

"dupe" is duplicate; only one such identical filing.

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Filings made AFTER end of ALL comments period:

15 Nov	2
21 Nov	1
22 Nov	2
23 Nov	4
Total	9

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To 23 November 2005:

Total number of filings: 3,795
Number of filings from 15 July through 14 November: 3,786
Number of filings from 31 August through 14 November: 1,724
Number of filings from 15 July through 30 August: 1.982
Total number of Replies to Comments: 62
Number of Replies to Comments prior to 1 November: 30
Number of Replies to Comments outside official period: 1
Total number of letter filings: 85
Total number of electronic filings: 3,708
Ratio of electronic to written filings: 218 : 5

These tabulations correct and correspond (on totals) with ECFS as of 10 PM EST on Nov 25 2005.