

To the Commission:

I respectfully oppose the Petitions for Reconsideration filed in WT Docket 05-235 filed by Messrs. Anthony Gordon (Mr. Gordon) and Russell D. Ward (Mr. Ward), and for the reasons stated hereinbelow, respectfully request those be denied.

[1] Morse Code's Status as a "Core Competency" is not a Mandate to Test.

Mr. Gordon, in essence, suggests that the Report & Order in this docket be repealed because, for the amateur radio service, future national security interests dictate preservation of proven knowledge in international morse code at the five word per minute (5 WPM) level. Mr. Gordon's suggestion that the Report & Order impaired national security offered no evidence that the national security had, indeed, been compromised; accordingly, I am opposed for those reasons which follow.

[a] Given morse code's long-standing history as the most reliable mode and the mode with the narrowest bandwidth at human-copy speeds, I agree with Mr. Gordon that morse code is a core competency within the amateur radio service and that, therefore, operational knowledge of and the ability to use international morse code is good operating practice, particularly for the Amateur Extra Class Operator. I also believe that knowledge of SSB/DSB voice, digital modes (RTTY, ASCII, PACTOR, etc.), SSTV, FM, and FSTV are core competencies. With extreme regret and some anger, I personally heard (as did my wife, who isn't an operator) two amateur radio operators verbally abusing a fellow ham on 3.87 MHz from about 9:30 to 10:30 PM Central time on April 7, 2007. Whatever sin the recipient of this abuse committed didn't justify and would never have justified the threats to his life, ridicule of his disability, and defamations of his character spewed on the air by the other two operators. This was not only extremely bad operating practice, but it was criminal behavior. Had these two abusing operators understood radio propagation on the band, they would have realized that when the band opened up, they and the offending operator could hear one another. From my vantage point near Kansas City, I could hear both sets of QSO's (I was repairing an old SB-101 at the time and listening to the frequency to adjust its IF transformer), and understood what they didn't: while the band was down, neither could hear each other, but once it opened, it appeared as if the operators stepped on each other. These two offending operators should have not used 75 meter sideband voice until they understood the very real possibility that a band opening could end their QSO instead of trampling this other operator - or better still, have just the common courtesy to take turns - if my fifth graders can do that, surely these "gentlemen" could. I pray future operators understand that our bands are heard not just by us, but by people around the world, and that we have an incumbent duty not to be offensive; accordingly, I pray the Commission acts on my e-mail regarding the foregoing incident so that we set an example to future operators that bad conduct on the air is not tolerated.

[b] National security is not at risk by eliminating Element 1 testing in 5 WPM morse code. In extremis - that is, when you are captured and need to tap out a message to the POW in the cell next to you, or when your aircraft is down and you need to key the microphone in morse code because your aircraft radio is damaged - military personnel might rely on morse code to send and receive messages. That said, national security modes would, nowadays, tend to be digital in nature. Given that voice modes are even digitized, if the Commission must give a mode-specific test to determine operator competency within national security modes, as a fairly recent U.S. Army Signal Corps soldier myself, I can state without hesitation that digital modes are the critical ones, if for no other reason than their ease of encryption. Moreover, at five words per minute, morse code can be learned pretty easily by our enemies, so it doesn't seem as if that mode is any more secure than another - unless you are encrypting your morse code carrier (which you shouldn't do unless transmitting to control a satellite). Accordingly, preservation of morse code testing on the basis of national security is a red herring. National security demands require that a truly proficiency amateur radio operator knows, can use, and is proficient in the use of ALL modes.

[2] Mr. Ward Suggests the Record is Incomplete.

In response to Mr. Ward's petition, I am opposed on the grounds that, even if true, his petition for reconsideration states a harmless error, and is not therefore actionable. Given the representative sample of responses received from amateur radio operators during the consideration of the docket, adding more responses to the mix wouldn't result in a statistically different outcome favoring or disfavoring the action taken by the Commission; accordingly, for reason of harmless error, I am opposed to Mr. Ward's petition and recommend its denial.

The foregoing considered, I respectfully request denial of these petitions for reconsideration, recommend the docket be closed, and all further proceedings be terminated.

Respectfully Submitted:

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COMMENTER IN OPPOSITION
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