

In the matter of the objections from Russel D. Wards concerning the way the FCC handles online comments, it should be noted that there is an established procedure for submitting comments by mail, that will not allow for a spam filter to eliminate the comment from the proceedings. The majority of persons submitting comments via the email or web based systems did NOT in fact have any perceived difficulty with those submissions. The fact that Mr. Ward did experience difficulties with his submission is NOT cause to reverse the action eliminating Morse Code testing from the licensing requirements. If Mr. Ward truly believed his comments were of such an important nature that the petitions before the Commission could not be properly considered without his comments, he should have taken advantage of Registered Mail to have them delivered in writing and obtained a Return Signature Receipt to confirm that they arrived in a timely manner.

In response to Anthony R. Gordon's petition that the Morse Code requirement be re-instated for Amateur Extra license requirements, there is no justifiable reason to require this for Extra Class operators when it is not required for other classes of license.

To suggest that there is some effect on National Security in removing the Morse Code testing requirement is in a word 'silly.' Morse Code as it pertains to Amateur Radio is not, and never has been a secure form of communications. National Security requirements are better met by other more efficient modes of operation even on the HF bands. To compare the need for keeping the Morse Code requirement to the Army keeping heavy armor in the face of a modernizing force structure is about the same as saying that all US citizens should be required to practice for 3 hours daily with an English Longbow to serve as a 'skilled pool' of archers to support military strategic requirements. The majority of Amateur Radio licensees who will answer honestly would admit that they learned Morse Code only to obtain a license and then never operated in that mode again.

So far as emergency response is concerned, the reason the Commission found that the majority of operations were conducted in other modes such as voice and digital, is that most Amateur operators have NOT maintained useful skills with Morse Code. Some who choose to do so have noted that since the change in testing requirements, there has been an upsurge of interest in learning and using Morse Code. To suggest that Morse is the only last

final resort in communications

shows a lack of knowledge on the part of the petitioner. Amateur radio has newer modes that are more spectrum efficient and reliable than Morse Code, which is maintained as a useful skill set by only a small percentage of operators. If there is a justification to the argument that Morse is vital to emergency response operations, then the Commission should remove all authority for any mode other than Morse Code to force the Amateur Radio operators to maintain skills in this antiquated mode of operation. The effect of such a move would however be to force an effective halt to new license applications resulting in the death of Amateur Radio as a hobby. That death of the service would render the objections of Mr. Gordon moot, as there would no operators to call on for any strategic or local needs of the agencies that are now served by Ham Radio.

As an Extra Class licensee, I like things just the way they are now. I do not agree with petitions like this one that are thinly veiled

attempts to keep the 'new guys' out of the Extra Class sub-bands. Some of the most skilled and knowledgeable radio operators I know are people who for various reasons were unable to cross the Morse Code 'hazing ritual' of the license testing prior to 2/23/07. These people are the ones who will continue to advance the radio art and technology as the Amateur service is established to do. Keeping these people from the Extra Class ranks because they have not proven the ability to perform an antiquated skill that has no relation to their ability as communicators does NOT serve the public interest at all.

Thank you for your time in reviewing this comment submitted via the FCC web portal.

Sincerely

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