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Federal Communications Commission
Washington D.C. 20554

To: The Commission

This letter is in comment to WT Docket No. 05-235, the petition to reconsider requiring Morse code examinations for the Amateur radio service, that was submitted by Mr. Anthony R. Gordon.

I have been an advocate for the removal of the Morse code requirement and have filed comments with the Commission in the past on this matter. My comments were quoted in documents that lead to the reduction of the Morse code requirement to five words per minute and its eventual elimination. The Morse code requirement had long outlived its usefulness and was rightfully removed as a requirement, in my opinion. The Morse code requirement is a hotly debated subject among Amateur radio operators. The arguments are more emotional than logical. Most of the arguments in favor of retaining this art are flawed; and the request to reconsider the requirement is flawed as well as I shall explain.

The reconsideration document proposed by Mr. Gordon sites the need for Morse code as a national security issue. In point one of his petition he states:

“My purpose in filing this position for reconsideration is to point out to the Commission that failure to keep the Morse Code telegraphy requirement intact, at least as a required examination element for the Amateur Extra Class operator license, fails to take into consideration the significant national security implications that require retaining adequate examination safeguards to insure the future viability that Morse code telegraphy provides, not only to the Amateur Radio Service, but to the nation as well.”

Currently I am not aware of a requirement for Police Officers, Firefighters, Emergency Medical Technicians, FBI Agents, TSA Agents, or any branch of the US Armed Forces, all charged with national security duties, to know Morse code. And these agencies are all first responders in the event of a national security incident. Thus the argument that lacking skills in Morse code as a radio Amateur is a detriment to the national security is flawed.

In his second point Mr. Gordon invokes the Department of Defense, the skills required of them, and their competencies at their functions. Again I am not aware of any requirement for soldiers using two way radios, telephones, satellites and the like to be required to know Morse code. In fact the Military Affiliated Radio System (MARS) ceased and prohibited Morse code transmissions as of October 1, 1996; over one decade ago. To infer that Amateur radio operators need Morse code skills to communicate with the Department of Defense stations is not only a flawed idea it is a PROHIBITED action.

Point three of the reconsideration document Mr. Gordon submitted states that Morse code is one of the “core competencies” of the Amateur radio service. He equates this as a critical skill in fighting the War Against Terrorism. He laments that the Commission dismisses the ability to test for Morse code and this some how harms the effort to fight the War Against Terrorism. There are numerous other skills an

Amateur radio operator should possess that are not required by the Commission to be tested. These skills include:

- Soldering Electronic Components
- Troubleshooting Electronic Circuits
- Building Antennas
- Circuit Construction
- Computer Configuration
- Circuit Design

These are just a few skills possessed by Amateur radio operators. The above listed skills would be VERY helpful in setup, construction, or repair an Amateur station in the time of crisis. But these skills are NOT tested nor is there a need to test for them in order for a person to obtain an Amateur license.

Mr. Gordon continues to expand on National Security with the War Against Terrorism theme in his fourth point. His argument here is that Morse code should be kept as a “Strategic Reserve” for National Security Interests for future Emergency Communications requirements. Again I must point out that “first responders” are not required to be skilled in the use of Morse code nor is there a need for them to use such a form of communications. Thus there is no valid or logical argument that having Amateur radio operators ASSISTING first responders need this skill to function effectively. Thus this argument fails to provide an adequate reason as to why Morse code skills are needed to obtain an Amateur license.

Point five of Mr. Gordon's petition notes the current popular techniques for emergency communications such voice, data, or video are being used. He argues that “the Commission has absolutely no assurance that these voice or digital modes of communications will even be operationally viable in future emergency communications environments.” He goes on to site several military campaigns and the need for “highly trained civilian amateur radio operators” to help fill the need of emergency communication needs. While I cannot argue with the need of such individuals, the need for telegraphy skills need not be part of their skill set. Again I site the ability for our military and domestic forces to function extremely well without the need of Morse code training. There is no guarantee that Morse code will be available when other forms of communications such as SSB voice, RTTY, PSK31, ATV, SSTV, and HF Digital Voice are not.

Therefore I must disagree with the idea of reinstating the Morse code requirement for ANY level of Amateur radio license. I respectfully request that the Commission reject WT 05-235 and not require Morse code testing in order for a candidate to obtain such a license at any level.

Respectfully

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