

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

In the Matter of)
)
Amendment of the Commission's Rules) WT Docket No. 10-177
Concerning Commercial Radio Operators)

NOTICE OF PROPOSED RULEMAKING

Comments of Owen Anderson in regard to Section-A: Commercial Operator Licensing Issues.

1. I obtained my First Class Radiotelegraph Operators License in 1948 and have served aboard passenger vessels as Chief Radio Officer. Unfortunately, that is a bygone era and we need to review the current purpose for issuing new radiotelegraph licenses.
2. I am aware of only two current requirements for a radiotelegraph operator's license. The first and primary requirement is to obtain a Radio Officer's License from the U. S. Coast Guard. The second is to operate a radiotelegraph station using morse code at a coast station or onboard a ship station during commemorative operating events that might occur once or twice a year.
3. The written examinations for any radiotelegraph operator's license consists of FCC Elements 5 and 6. These test pool questions and answers are probably at least 20 years old and are totally irrelevant in today's world.
4. Element-5 is a 50 question exam with a test pool containing 286 questions. It covers a wide range of subjects such as rules and regulations, operating procedures, radiotelegrams, preambles, priorities, numbering, word counts, service prefixes, distress-urgency-safety communication procedures, silent periods, "Q" signals and abbreviations, adjusting telegraph key contacts, and equipment operation.
5. Element-6 is a 100 question exam with a test pool containing 616 questions. It covers a wide range of subjects including a large number of questions dealing with electric and electronic theory that is also covered in FCC Element-3. It also covers topics that are no longer relevant today such as vacuum tubes, auto alarms and radio direction finders.
6. If the U.S. Coast Guard were to change its license requirements from a radiotelegraph operator's license to a GMDSS Maintainer/Operator's License there would be no need to issue any new radiotelegraph licenses. The rare commemorative station operations are usually conducted by long time holders of existing radiotelegraph operator licenses.
7. I would propose the following rulemaking:
 - All existing radiotelegraph operator licenses that are currently valid or still within the 5 year grace period for renewal be given lifetime authority.
 - Delete the requirement for a photograph for new issue or renewal of license applicants.
 - Issue a single class of radiotelegraph license titled: "Radiotelegraph Operator's License".
 - Delete the requirement for exams using Elements 5 and 6 and replace with Element-3. This will provide the applicant with a currently useful license and would result in receiving both a radiotelegraph operator's license and a GROL.

Thank you for your consideration.
Respectfully submitted,

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