

Applicant Name: Hans J. Heimburger/N6TCZ

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Author Name:

15100690

Lawfirm Name:

Contact Name: applicant_name

Contact Email:

Address Line 1: 281 Argonne Ave.

Address Line 2:

City: Long Beach

State: CA

Zip Code: 90803 Postal Code:

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Federal Communications Commission
1270 Fairfield Road
Gettysburg, PA, 17325-7245
Internet address: <http://www.fcc.gov/e-file/ecfs.html>

August 31, 1998

Re: FCC Notice of Proposed Rulemaking, WT Docket 98-143.

Dear FCC:

I have **been** a licensed Radio Amateur for the past 21 years and still **enjoy** this hobby.

I do recommend the following changes to WT Docket 98-143:

A. Eliminate the current Novice Class license----it will free up the use of those odd band frequencies, and so few hams, these days, start off at the Novice level anymore.

I also feel it is appropriate for the FCC to not only delete the Novice bands and the power restrictions on higher-class licensees. By removing the power restrictions on the higher-class licensees and to permit the current Novices to operate CW anywhere on the **80M**, 40M, 15M and 10 Meters at 200 watts output would be again an overlap between the current Novice and General Class license holders.

B. Change the title of the current No-Code Technician license to just Technician. The new Technician license would only have operating privileges higher than 30MHZ.

C. Retain the current FCC **and** IARU basic code requirements at least 5 WPM for **all** amateur bands below 30MHZ.

D. The following needed changes to the current General Class license should be, I strongly recommend, dropping the current 13WPM Morse Code (CW) requirement to be reduced to only 5WPM. **By** doing so it would encourage more currently held Novice, Code Less Technician and Technician Plus Class holders to upgrade to at least to the General Class license.

By keeping the current General Class Morse Code requirement of 13WPM; I feel, will effectively raise the bar against any future ham radio applicants aspiring any use of the High Frequency (HF) operating privileges. unless the FCC ultimately reduces the Morse Code requirement down to the 5WPM level.

E. I believe that the current FCC three-level system of Morse Code (CW) testing should be reduced, from a three-tier to a two-tier system of testing. The two-tier system would interest more people toward entering ham radio to start out with. And thus, would greatly increase the number of hams wanting to upgrade to say the General Class or even the Extra Class License.

F. The required testing speeds: As I have stated before, the Morse Code speeds should be 5WPM for the General and Advanced Class Licensees. For the Extra Class License it should be reduced, say down to 10 or 13 WPM.

G. I would feel hams are willing to trade for a reduction in Morse requirements in having additional written elements on the newer digital technologies such as DSP, AMTOR, PACTOR and PACKET. This would really encourage people to become hams, who otherwise have felt bothered in having to learn the Morse Code beyond Swpm (At least on the HF bands). Also, it's a good incentive to keep upgrading to the next higher class of license.

H. I feel the VE's should have the power to determine the type of Morse Code testing method instead of the FCC's specifying Morse Code examination methods.

I. The same for the current FCC rules, the written examination should be changed to allow VE's and VEC's additional flexibility in determining the specific contents of the written examinations.

Last: as a Fellow American, a licensed Amateur Radio Operator, a proud member of the American Radio Relay League and a veteran of the U.S. military, know as myself that as we, Radio amateurs must look forward toward the new coming millennium in the many progress made in the electronic fields. We hams must not always dwell in past achievements, for example: CW over spark, SSB over AM or FM over AM.

By agreeing to my recommendations the American Radio Relay League (ARRL) will be able to outreach to more of the. Electronic minded population younger thinkers. computer "wiz-kids" future digital electrical engineers now in middle and high schools. Even combined uses of the Internet with ham radio can be a tool (Not having any fear of change in the future as predicted by some individuals as the coming downfall of ham radio).

The FCC would be wise to rethink the existing amateur radio entry points. (The current sad state of the low numbers of Novice hams, Technician Plus hams not able to pass the. current Morse Code requirement of 13WPM to make General proves this point). FCC should be able to identify and be able to adopt newer ideas that will fit the needs and concerns of today's growing interest in electronics. It requires imagination and an honest seeking to reinvent ourselves (the ham radio population) to the extent that the ARRL is conveyed as powerfully as it deserve\ to be.

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For example: The idea of trying to fit some square pegs into round holes does not work very well----**as** keeping the three-level system of Morse Code testing, and having the General Class Code speed always set at 13WPM.

If the FCC would change the said rules. it would create a more basic entry point, more breaks into the circle is an important key to all concerned: the **FCC** the ARRL **and** the overall amateur community both **here** in the United States and elsewhere in the world.

‘With all said and done, Amateur Radio could help lead the way in the furture of electronics in America, or the hobby could end up as a sad situation of some old men playing with their electric train sets!

Sincerely yours,

Hans JHeimbürger/N6TCZ

28 1 Argonne Avenue

Long Reach. CA, 90803

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