# Comments Received on Gazette Notice No. DGRB-003-04

**Recommendations from Radio Amateurs of Canada to Industry Canada Concerning Morse Code and Related Matters**

Commentaires reçus à la suite de l’avis de la gazette DGRB-003-04

Recommandations de Radio Amateurs du Canada à Industrie Canada concernant le code Morse et autres sujets connexes

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# 1 - Duncan Elliot

Re: Notice No. DGRB-003-04 - Consultation on "Recommendations from Radio Amateurs of Canada to Industry Canada Concerning Morse Code and Related Matters" Publication Date 2004-8-20

I support the proposed elimination of the Morse code proficiency requirement as stated in notice DGRB-003-04. I question whether the Intermediate qualification is sufficient to operate 250W home-built transmitters.

Today, we use a wide variety of modulation and information coding techniques. CW and International Morse code are just one example of each. From the Industry Canada web pages, "amateur radio service" is defined as "radiocommunication service in which radio apparatus are used for the purpose of self-training, intercommunication or technical investigation..." Following the lead of the ITU and many countries, eliminating the Morse code requirement would facilitate greater participation in all three of the stated purposes of the amateur radio service. The elimination of the Morse code requirement will make it easier for the students I work with to become licenced to conduct novel experiments of their own using the unique characteristics of the bands below 30 MHz.

I cannot support the RAC’s Recommendations 8 & 9 regarding home-built transmitting equipment with the current Basic exam syllabus and the current 250W power limit. (Of course changes to the syllabus have also been proposed.) Perhaps a lower power limit (e.g. 5 watts) could apply to home-built transmitters, including kits. I am concerned that the current Basic syllabus does not have sufficient depth in electronic circuit and radio theory and that such amateur radio operators could cause interference or risk personal safety in building radio transmitters (including kits). After all, the quality factor (Q) of a tuned circuit appears only in the Advanced syllabus. The RAC’s specifications for "kits" didn't indicate whether or not these kits would require tuning/alignment prior to use or could be inadvertently detuned during construction. Perhaps some kits are nearly foolproof. Is Industry Canada prepared to test and type-approve kits as not requiring the Advanced qualification? Perhaps there should be an amateur qualification (Advanced or otherwise) that entitles licence holders to certify home-built higher-power transmitting equipment made and operated by Intermediate qualification holders.

The meaning of the Intermediate qualification being a "prerequisite" for the Advanced should be clarified. It should always be possible to take both tests at one sitting (with computer administered tests, this is a non-issue). While I don't have an appreciation of the record-keeping overhead, there would be some...
advantage if passing the Advanced test without passing the Intermediate test could give the person credit for the exam but no Amateur Radio Operator privileges. Such technically qualified individuals would have more incentive to repeat a basic test if not successful the first time.

One procedure for record keeping of partial credit for passed sections of examinations is to give this discretion to the Accredited Examiners. Accredited Examiners, at their option, could require only failed sections to be completed at a subsequent exam sitting. There would not necessarily be transfer of partial credit between Accredited Examiners if a different examiner was administering a subsequent exam sitting.

Sincerely
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Duncan Elliott, Associate Professor
Dept. of Electrical and Computer Engineering

#2 - Joe Craig
This proposal has no provision for protection of users of other modes from interference from SSB. This is frequently a serious problem, especially during contests and, as is acknowledged in the proposal, will likely be compounded if this proposal is implemented. RAC in its representative capacity for all amateurs in Canada, including those who use these other modes, could address this deficiency and submit a revised proposal to Industry Canada. This could be done, for instance, by requesting the bandwidth restrictions currently on the 10.10 to 10.15 MHz band be extended to portions of all bands below 30 MHz thereby ensuring spectrum is available for the use and development of other modes and experimentation with possible new modes.

The proposal removes the incentive to learn Morse code. A decade ago the International Amateur Radio Union asserted the utility of Morse code in "intercommunicat[ion] without regard to equipment or language barriers, to ensure the orderly shared use of a limited resource." This is equally true today. Additionally, no mode has emerged as an "alternative means for ensuring that amateur stations can intercommunicate" which has become "sufficiently universal to obviate the present [Morse code] requirement". Amateur radio is by definition a service of intercommunication and if provisions are not made to encourage learning Morse code, intercommunication will be adversely affected. Additionally, Morse code remains an enjoyable aspect of Amateur Radio for a substantial portion of those who learn it. Without an incentive, many will be deprived of this enjoyment. To provide incentives, the Basic + 5 WPM should be retained and an option to HF privileges and the Advanced qualification should include passing a 5 WPM test for example.

Yours truly,
J. Craig

#3 - Robert Allison
My response to the recommendations:
1. Yes.
2. No - have a separate exam for Intermediate Qualification.
3. Yes.

4. No - keep it simple.

5. No - let us encourage people to get into the hobby.

6. Yes, but no to the 70%, again, we are trying to encourage people.

7. Yes.

8. Yes.

9. Yes.

10. No.

11. No.

12. No. KEEP IT SIMPLE AND NO COMPLICATIONS SUCH AS #2 AND #4.

#4 - Guy Dumas

Je suis tout à fait d'accord avec le retrait de l'exigence de la connaissance du code morse pour l'utilisation des fréquences inférieures à 30 MHz dans la bande HF du service d'amateur. À mon avis la vocation de la radio-amateur a beaucoup changée, et avec le développement fulgurant des radio-communications est plutôt devenu un hobby et une source d'apprentissage extraordinaire.

Certes, en certaines région éloignées et/ou moins développées, ce mode de communication demeure un lien prioritaire. Dans de tel cas, la liaison se doit d'être fiable et conviviale. Le morse, est fiable et non conviviale. Il ne devrait plus être exigé de connaître un code afin d'avoir accès à un monde fascinant.

Guy

#5 - Bob Tenty

Abstract.

As RAC member I'm pleased with the RAC proposals but don't agree fully with Recommendation 7 & 8 and would modify recommendation 10 also.

Combine recommendation 7 & 8 to:
Design and Construction of transmitters from scratch should be allowed on ALL amateur bands for the Intermediate Qualification!

Recommendation 10 should be modified as follows:

Recommendation 10: New Entry Qualification should include operation on HF shortwave, 144 & 440 MHz bands all mode and including commercial kits.

This along the lines of the Foundation license in the United Kingdom.
Explanation

RAC recommends in "Recommendation 8" that holders of the new Intermediate Qualification be permitted to construct and use commercial transmitting equipment kits and in Recommendation 9 that holders of the Intermediate Qualification are permitted to construct and use their own transmitting equipment in the bands at 2.3 GHz and above.

If Intermediate Qualification holders are allowed to design and construct their own transmitting equipment above 2.3 GHz they should be more as qualified to construct their own transmitting on the HF shortwave bands.

Construction of microwave transmit equipment is much more difficult and also asks for a much larger investment in test equipment as it is more expensive for these bands.

Those who can construct transmit equipment for the many amateur (and shared!!) microwave bands above 2.3 GHz can certainly handle the construction, design and responsibility for the HF amateur shortwave bands and VHF/UHF.

It is very much in Canada's economic interest to support innovation.

I recommend combining Recommendation 7 & 8 as follows:

Allow holders of the new Intermediate Qualification to construct and design their own transmit equipment for ALL amateur bands!

A practical assessment for the Intermediate Qualification like in the UK maybe worthwhile to consider. (They have a practical assessment for the Foundation and Immediate qualifications)

Recommendation 10

RAC recommends that a new entry-level qualification be introduced

I fully support a new entry level qualification but along the lines of the Foundation license in the United Kingdom. This means a license with 10 Watts transmit power, access to the HF shortwave bands (HF - 440 MHz) all modes with a theoretical and practical assessment, with permission to use duly constructed commercial transmitting kits.
Don't hide those people on VHF/UHF but full involvement with those on the HF bands like the QRP community will lead to a better and long lasting experience. Involvement with the worldwide community is key to success. Working on HF is an effective stimulant for those people, ask the RSGB!

Also most commercial kits are made for HF with affordable pricing.

It makes no sense introducing a new license with commercial equipment only without commercial kits.

The target is to introduce young people to Technology & Science and life long Learning as outlined in the rac document.

Amateur Radio is about the Science & Technology behind that transmitter and receiver.

Its purpose is experimentation.

Just be putting only commercial equipment (= no kits) at somebody's table doesn't cut it otherwise we should have as many Engineers, Scientists and Technicians as cellular phone customers in Canada.

Respectfully submitted,

Boudewijn (Bob) Tenty

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#6 - Val Lemko

Dear Sir:

RE: RECOMMENDATIONS BY RAC

I am against some of the Recommendations submitted by RAC on my behalf, specifically the dropping of Morse Code. There are 59,900 Hams in Canada and RAC only took a sample of 1400 Hams, 66% of these Hams were Basic Qualification. What did you expect them to vote for?

If you listen to any repeater in Canada, you will hear all the "waiters" rallying to send in their recommendations and I even hear one Basic Ham say it has been passed and everyone will have their "Grandfathering Letter" as he called it, soon.

Putting some of these Basic Operators into Intermediate class could cause a real fiasco for local Industry Canada offices, as even 100 watts of power can create problems in the new unfiltered electronic equipment.

Dropping the code is also going to be the end of RAC, a recent e-mail I received states that a lot of Hams are dropping their RAC subscriptions. As it is, with the recent resignation of the President and Vice-President, RAC is on shaky ground. I am also dropping my RAC subscription, as I feel the did not fairly represent me and other Hams.

Industry Canada as a Government Agency should have sent out a ballot to every Ham so they could express their views. It seems like our government is going to do what they want anyway, we a nation of "followers" and it would really harm us to know 5 wpm of Morse Code.

**Recommendation 1:** Against dropping morse code requirement for operators below 30MHz

**Recommendation 2:** Achievement of 80% will put Ham Radio out of the hands of common people unless you have Tech School Education.
May become a rich person's hobby, and will eliminate old people who can't learn that well any more.

**Recommendation 3:** No fault with

**Recommendation 4:** Again, this is unfair to poor and shows discrimination due to age and learning disabilities. The handicapped and seniors groups will have a field day with this one.

**Recommendation 5:** Leave at 60%, as it allows more people to get into the hobby.

**Recommendation 6:** No fault with

**Recommendation 7:** Want Basic to pass 5wpm to qualify for Intermediate.

**Recommendation 8:** No fault with

**Recommendation 9:** No fault with

**Recommendation 10:** No fault with

**Recommendation 11:** No fault with

**Recommendation 12:** No fault with

Sincerely,

Harvey Lemko

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# 7 - Sohail Anjum

Hi,

I read the report that RAC submitted to IC regarding the dropping off the Morse Code and raising the test mark form 60% to 70% and agrees to the most of the suggestions. However I don't agree to retest those who already hold the ‘Basic’ license to grant to operate on HF bands with the ‘Intermediate’ license. The question whether to retest or not those who holds the "Basic" was never there in the surveys when RAC carried it out last year.

RAC will misrepresent the views of the Canadian amateur radio operator to the IC with the current purpose report to retest the current 'Basic' for the HF operation.

I don't see the link between the Morse code and Intermediate Qualification. Intermediate Qualification is just a raise from 60% to 70% a person has to demonstrate his technical knowledge. Here are my concern.

2. Is a person who has passed the exam with less then 70% in the past (but more then 60%) and also passed the Morse code test has better technical knowledge then the person who passed the exam more then 80% but did not took the Morse code test?

How come this report is suggesting to retest these people who already passed the theory test with better marks and demonstrated higher technical understanding. It is just to filter out the people and not to let them come on HF bands because of the fear that bands get crowded.

Again we reach to the same questions that why the Morse Code makes that difference.
I passed my exam with the 80% and I think that I have demonstrated the technical knowledge to have the privilege to operate on the HF bands then the person who passed his theory exam with 60% and passed the CW test. I also carried out successfully delivering amateur radio training course on my own in summer 2003. All of the students passed their BASIC license and some of them latter passed their CW test. They are all members of Mississauga Amateur Radio Club (www.marc.on.ca) in Ontario.

I agree that new exam passing marks should be raised from 60% to 70%.

I strongly protest that the current Basic License holder should not be re-tested and their licenses should be upgraded to HF band privilege.
Thank you,
Sohail Anjum

#8 - Maurice Koroniak

Recommendation 1 – Eliminate the Morse-code Qualification
I am in full agreement.
This requirement is obsolete and does not contribute to more knowledgeable amateurs.

Recommendation 2 – Higher pass marks & a new Intermediate Qualification
I disagree.
Creating another qualification designed to keep amateurs from using HF spectrum is discriminatory. It reflects an exclusionary attitude of a minority of current licensees.
There is no evidence to support raising the pass mark other than the prejudices of a few people.

Recommendation 3 – Prohibit operators with only Basic Qualification from using HF
I disagree.
We need more amateurs, especially those with an interest in emergency preparedness and trained in the use of HF. Maintaining unnecessary roadblocks to amateurs for accessing HF radio spectrum is not and has not been justified in the proposal.

Recommendation 4 – Re-examine Basic Qualification holders with a view to obtaining 80% for obtaining an Intermediate Qualification
I disagree.
The qualification should be respected, as is high school graduation and degree requirements in the face of changing curricula.

Recommendation 5 - Increase pass marks for the Basic Qualification to 70%
I disagree.
It has not been demonstrated that entry to our hobby needs to be more difficult. We need new entrants
and those sincerely interested will learn as they go. There is no evidence to support this requirement.

Recommendation 6 – Existing Basic & Advanced qualification holders be allowed to use HF. Future Advanced candidates need to obtain 70% pass mark and pre-requisite of new Intermediate qualification or Basic with Morse Code.

I disagree

All amateurs with the Basic qualification should be given access to HF spectrum. Additional roadblocks to access HF spectrum is unnecessary.

Recommendation 7 – Continue Morse-code examinations for those who wish to have the qualification.

I disagree

Recommendation 8 – Intermediate Qualification holders may construct and use commercial transmitting equipment kits

I disagree

All Basic Qualification holders should be allowed to construct and use commercial transmitting equipment kits.

Recommendation 9 – Intermediate Qualification holders be permitted to construct and use their own equipment at 2.3 GHz and above

I disagree

I disagree with the concept of adding the proposed Intermediate Qualification.

Recommendation 10 – New entry-level qualification be introduced.

I disagree

Current requirements are not onerous. Clubs can assist by providing licensing courses.

Recommendation 11 - New syllabus be divided into several elements and pass mark be required on every element.

I disagree

The syllabus and question banks should be updated and be improved. Question banks can be expanded and the negative type questions should be eliminated. However, I think the current syllabus and question banks are reasonably good for examinations. I don't think it is necessary to break up the examination into separate parts with their own pass marks.

Recommendation 14 – Pass marks on all elements be set at 75%

I disagree

I am not aware of any evidence that candidates passing with a lower grade (eg. 60-74) are a problem for the amateur radio service. Higher pass marks are not necessary.

Sincerely,
Maurice Koroniak

#9 - Barrie Skeldon

4. YES, drop the Code requirement.

6. NO, to complicated, recommend one “General” exam and full privileges. Forget about any use of Morse for any qualification.

8. NO

10. NO, set new General exam. Grandfather existing Basics as was done with General to Advanced back in the early 1990s.

12. NO, if the pass mark was good enough at 60% what value has Morse to do with that.

14. YES to basic + Advanced for HF privileges, NO to raising pass on advanced to 70%.

16. What is the value of this if Morse is not a requirement??

18. NO

20. YES.

22. YES, call it a General Level with HF privileges

24. YES

26. NO, leave it 60%.

28. My Recommendation: Simplify the whole situation with a single exam that emphasizes operating procedure and regulations. Today’s equipment cannot be tampered with to the same extent as 30 years ago therefore it does not require an in-depth knowledge of radio theory, leave that to the Advanced Class for high power operation.

R.B. Skeldon.

#10 - Rothenberg

am opposed to any "watering down" of the requirements for HF operation in Canada.

2. If proficiency in Morse Code has to be dropped, then it MUST be replaced with something equally challenging and relevant to today in order that prospective HF operators actually have to EARN their privileges. We all see the consequences when people don't earn their privileges or similarly don't work to earn something.

If Morse Code proficiency is to be dropped as a prerequisite for HF operation, I agree with the position and all of the recommendations of Radio Amateurs of Canada (July 2004).

Surely this must be seen as a compromise. Requirements for CW are dropped, but high standards are
maintained for entry into the proposed intermediate level.

Thank you for considering my comments,

#11 - André Turcotte

Il y a plus de trois ans maintenant que je n'opère plus sur les bandes VHF et UHF par manque d'intérêt et de temps. En effet je préfère de beaucoup les communications outre-mer sur HF. Le 11m c'est bien mais pas ouvert assez souvent. J'aimerais bien avoir la possibilité d'opérer sur 20m. Avec les facilitées de communication d'aujourd'hui, si on continu d'exclure du HF, les opérateurs n'ayant pas leur compétence en morse, je pense que les bandes deviendront désertes d'ici quelques années. Personnellement je n'ai pas le temps d'apprendre le morse et je n'en vois pas non plus l'intérêt. Je souhaite que la réglementation soit amendée pendant qu'il est encore temps.

#12 - Rich Roadhouse

In general, I am in favor of the recommendations but add the following comments.

I think that there should be more of an incentive to progress from Intermediate to Advanced. This could be done by restricting the power output they could use as Intermediate and also placing some restrictions on where they could operate in each of the HF bands. I also think it is essential that all new HF licensees be made fully aware of the RAC Band Plan, and be encouraged to follow it.

#13 - Gerry Kenney

Dear Mr. Skora:

I read an article a few days ago in the Ottawa Citizen's ONLINE EXTRAS feature of their web site entitled "Ham radio buffs want no more Morse". The article indicated that "Industry Canada is calling for public comment on the proposal to eliminate proficiency in Morse code to qualify as a ham. I called Industry Canada to speak with the department responsible for Amateur radio. I was given the following number: 998-3693. The person at that number confirmed that I was indeed speaking with the department responsible for Amateur radio. However, that person knew nothing about the call for public comment on the Morse issue and assured me that no such thing was taking place. This was very surprising given the above referenced Notice in the Canada Gazette.

I wish to submit the following comment as a private citizen holding Amateur call sign VE3GIK:

It often happens that when there are two sides to an issue, the issue is formulated in such a way that for one side to win, the other must lose. The Morse code issue for Ham licensing appears to be evolving in that fashion. A recent Canadian Press article reports that The Radio Amateurs of Canada, which is said to represent 2/3 of Canadian Hams, wants the proficiency requirement in Morse Code to be abolished for Amateur qualification. The way the polemic is formulated, one is led to believe that the other 1/3, which is said to consist of those who "have been amateurs for years and years, the real old-timers", do not want the Morse requirement to be dropped. This is called jumping to conclusions.

I am one of those who has been a ham for years and years, a real old-timer who got his license in 1959. Morse code was one of the more exciting aspects of the hobby in those days. There are some for whom Morse Code is still the most exciting part of the hobby. The positions of the two sides are not irreconcilable. Allow me to propose a potential scenario which should accommodate both sides while respecting the views of both.
First of all, I would like to point out that there are certain differences between voice operation and code operation that make the two not fully compatible within the same frequency assignments. Code operation is much more bandwidth economical, requiring far less bandwidth to transmit information efficiently. Many more simultaneous code signals can be accommodated within a certain bandwidth than voice signals. Code can get a message through in conditions that render voice communications very difficult, if not impossible. Code transmissions cause far less QRM than voice signals. There is therefore a case for restricting certain relatively small parts of the HF bands for code only communications by those hams who wish to take advantage of their code proficiency and the greater efficiency of code for getting a message through. The remaining portions of the bands should be open to all hams for either code, voice or other permitted media of communications in the HF bands.

I propose the following:

1 - That the requirement for code proficiency to qualify as a Radio Amateur be dropped.
2 - As described above, that certain small parts of each band be restricted to code only communications by those who wish to use that medium.
3 - That a certain portion of the qualifying examination be reserved for a section on the history of Amateur Radio including the role that Morse Code operators and experimenters played in the beginnings of Amateur Radio which allowed old-timers to set the early foundations for Amateur Radio as we know it today to be enjoyed by both young and old.

I am surprised by one part of the brief presented to Industry Canada by Radio Amateurs of Canada, as reported in the Citizen article, i.e. "Many radio amateurs, and would-be radio amateurs, now regard Morse code as being irrelevant and uninteresting." I find such a statement akin to saying "The history of our country is irrelevant and uninteresting." While I agree with the proposal that Morse code not continue being a requirement for licensing hams, I would also propose that the code proficiency requirement be replaced by one based on general knowledge of historical aspects of the great contributions ham radio operators have made throughout the years to the development of HF radio communications, from the days of spark radio transmissions to today's slow scan television, packet radio, moonbounce and other more advanced media. It is not a wise position to declare that our past is irrelevant and uninteresting.

Sincerely,
Gerard I. Kenney

#14 - Tom Hoskins

Dear Sir / Madam,

I'm in full support of having the Morse Code requirement removed form future testing, to access to the HF Bands ( Recommendation #1 RAC ) But I do not agree with the recommendations that proceed #1 ..........reasons below

Fact: Morse Code had very little to do with this special knowledge that RAC claims it to have! In the early years all you needed was to be able to send by hand and received by ear signals in Morse code a few rules and regulations and so to speak you of to the races......Now that it removed by the ITU has a treaty agreement, and most other countries are dropping the code , RAC has to come up with another way to keep amateurs from gaining access to
the HF BANDS...........with recommendation # 2 through # 12 they will indeed accomplish this if Industry Canada gives them the green light.

**Fact:** The Basic qualifications are the ones that prepared all Amateurs for HF operation, the study guides touches on just about every aspect relating to amateur radio. AM, FM, CW, SSB transmitters plus various digital mode, antenna tuners, Basic Electronic, frequency allocation for amateur bands, rules and regulations, and the list can go on. So for someone from RAC to make the suggestions, that the basic operator with under 80% should not be allowed to operate on the HF Bands because he/she do not have the technical competence and a good knowledge of international regulations to operate below 30mhz

I would ask why a person with the same basic license plus Morse 5 or 12 wpm get their COMPETENCE by listening to Morse code tapes because 85% of the people who have taken the test never made one contact using CW ..........and most of the members on RAC. never had to study what the basic or advance licensee have to study today my god wasn't life simple back then!!!

RAC Seem to have a great deal of concern about the possibility of the new operator causing interference to other Amateurs that share the same bands in Canada and other countries, well we should all be concern about this, keeping in mind that Morse code did not help in reducing interference in the pass, how could it there nothing on the tapes to teach about interference or how to fix the problem. So I guess they had to go back to the Basic study guide and figure out what could be done to resolve the problem, taking into account that the problem was related with the stations antenna or how it was set up.

RAC suggest that when taking the exam that anyone with a wrong answer should lose 2 points because he / she may have guest the answer this is unfair to the person tacking the exam! At present the basic exam has 100 questions per test from a pool of over 500 questions, to even suggest that one could remember all 500 questions sounds a little far fetch ...then to sweeten the pie so to
speak they suggest that the basic operator be allowed to Build and operate a transmitter for 2.3 GHZ and above this should sound a bell in anyone head!

Not knowing how radiation at those frequency could possibly harm the human body! Nice way to welcome new amateurs!

In conclusion

I would ask Industry Canada, to continue with the present grading of the basic and advance exam with the minimum pass mark of 60% the question bank and study guide should be upgraded has new material relating to amateur radio surface. The Basic operator should be given the privilege to operate on all amateur bands when the Morse code is dropped .Industry Canada should remember that Morse code was only a mode of transmitting like am, ssb fm etc. it had nothing to do with making the amateur operator more qualified to operate on the hf bands this knowledge came from the study guides, rules and regulations set in place by Industry Canada . Plus other amateurs that lend a helping hand when it was needed .

Morse Code testing should be given to amateurs who want to use that mode of transmitting, or they may need it when operating in a country that require Morse code endorsement . Maybe RAC. Could do the testing, and issue a certificate of endorsement for Morse code,

Industry Canada should not agree with the recommendations that RAC. has provided. This can only be look upon has another way to DISCRIMINATE against people who would like to enter into the hobby of amateur radio, just like the Morse code have done for years,

EXAMPLE recommendation # 2

will discriminate against a few thousand basic operators alone that are just has qualified to operate HF than someone with Morse code or advance qualifications
Tom

# 15 - Cordell Rolfson
September 17, 2004

Dear Sir or Madam:

My comments on selected portions of the RAC recommendations are:

2. [Re: Recommendation 4] It is my opinion that current holders of the Basic license, who passed this examination with a grade greater than 80%, should not have to re-take the examination in order to qualify for the Intermediate qualification. Requiring them to retake the same examination is vexatious and unnecessary.

It is my understanding that examiners are required to retain marks for a period of five years. Industry Canada should immediately notify examiners to retain all marks past this five year horizon until such time as this matter is resolved.

4. [Re: Recommendation 11 and 12] The pass marks on the various elements should be lower than the overall pass mark requirement. E.g. if the overall pass mark is 75%, then the minimum pass mark on a section should be 65% or 70%. This accommodates students who may be weak in one area, but overall have a good knowledge. If any element is deemed to be critical, then that element alone could be given a higher requirement.

Sincerely,

Cordell B. Rolfson

# 16 - Sal Guzzo

I would like to provide my comments for the proposed change to the Morse Code requirements. I agree with the change. I have been an amateur radio operator (va3guz) since the early 1980s. I believe Morse Code continues to be an important skill to maintain, since it is valuable to use when all other means of communication fail. With this being the case, I would not be opposed to restricting particular bands on HF to morse code transmission only. This will allow veterans to continue to practice their skill, and continue to feel their additional skills warrant particular privileges.

Although, on the whole, I believe that HF frequencies should be obtained up to basic qualification holders as proposed by RAC. I do believe the RAC proposal to have all basic qualification holders, such as myself, to be retested in order to obtain over 80% in order to obtain the privilege of transmitting on HF bands is ludicrous. When I took the test originally, I obtained over 80%, therefore I don’t understand why I should be forced to take it again in order to prove my competency when I have already done this years
ago. Doesn’t Industry Canada have my original grade? It is only on this point that my opinion differs to the RAC proposal. Otherwise, I deem that removing the Morse Code restriction will revive the hobby. At the moment, having Morse Code as a means of restricting use to HF frequencies seems ludicrous since hardly anyone uses Morse Code once they obtain their HF license.

Looking for the change. I hope it comes quickly, Sal Guzzo

# 17 - Roy Geldart

Sirs:

I am in favour of eliminating the code requirement for radio amateurs.

However, I feel the other requirements for a license should be kept at a high level with increased emphasis on regulations, operating practices and theory.

Unless changes (such as eliminating the code requirement) are made to regulations governing the licensing of amateurs, the hobby will fade in the years to come.

The amateur community already has to compete with internet while trying to lure Canada’s youth.

Without youth interest in amateur radio, the hobby is destined for extinction.

I hope my comments help IC to make a decision which will see no requirement for Morse code, while at the same time maintaining or increasing knowledge requirements for operating, regulations and theory.

Roy Geldart

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# 18 - Steven Leblanc

Sept 18, 2004

Let me start by saying that "I DO NOT BELIEVE THAT RADIO AMATEUR OF CANADA (RAC) REPRESENTS THE WISHES OF MOST CANADIANS!"

RAC only represent those amateurs that subscribe to their services. There are 52,000 licensed amateurs in Canada. Out of these, a mere 1,400 participated in their survey. In order to make this a more valid survey, they had the tools to contact all amateurs in Canada to inform them of this survey. As it was, ONLY RAC members were informed.

In the RAC recommendations, they have a chart showing the average pass based on “guesses”. Where did this information come from? Were they guessing? How could anyone know how many questions the average student would guess at?

The board at RAC is comprised of older hams who are opposed to change. So they recommend changes that suit them. As for their facts and figures, they seem very suspect to me.

I can easily come up with my own figures to get the results I want by contacting just a certain group of Amateurs. I’m sure if I were to contact mainly younger Basic License holders only, I could guarantee that 80-90% would be in favor of dropping the code.

If I wanted the opposite results, contacting older hams with their codes, the result would be a majority against dropping the code.
Short of sending out mailings to all amateurs in Canada, the results of their survey is biased toward the rest of the Amateurs in the country.

I know in this area, that most of the RAC subscribers that I personally know, are all older hams who have been fully licensed for many years. About half of those that I have talked to are dead set against dropping the code. The others either want it dropped and the bands opened, or are of no opinion.

I believe if the recommendations of RAC are taken seriously, it will in fact harm the amateur Radio service.

Licensing in Canada, as well as around the world, is already dwindling due to other factors such as the internet. I thought it was RAC’s duty to help promote amateur radio in Canada, not discourage people from entering the hobby.

When I talk to people about ham radio, the first thing they tell me is that they can't get their Morse Code. I myself do not have my code validation. But I do know it. I just need more practice. So I feel that this is one of the major reasons a lot of people do not try for their licenses.

I can not understand why, when most countries are doing away with the code and opening the HF bands to all licensed amateurs, that RAC is recommending that you toughen the testing and make access harder. I myself did well when I tested in '93. I scored between 85-95%. Are my scores still available? If not, would I have to re-test to get on HF? I know myself, I would not do it. Several friends have said the same thing.

The following is my opinion of the RAC recommendations for Amateur Radio. I do not disagree with all their recommendations, but I feel some will be detrimental to Amateur Radio in Canada.

1 Dropping the Code:

I agree that the code be dropped only if all amateurs licensed in Canada are given full access to the HF bands

2. Raising the pass mark to 80% to gain access to the HF bands:

A written mark of 80% does not make anyone qualified to operate on HF. There are a lot of people on HF that passed stricter testing than this that do not belong on HF. The current pass mark of 60% is fine.

The RAC recommendations would punish me for not getting my code sooner. As well as creating more red tape for those who may have a little trouble in their testing.

3. Once again, they are trying to make obtaining an HF license more difficult for the average Canadian and punishing those of us whom have been on the air on VHF for many years. I feel that the 11 years that I have been active on VHF makes me more qualified for HF than someone who just passed his basic with a score of 100%.

4. I SHOULD NOT HAVE TO RETEST after having proven myself 11 years ago.

5. Raising the pass mark by 10% will not create better hams. Putting more emphasis on operating procedures will. I believe cutting down on the electronics in the basic and replacing it with a section on proper on-air procedures would be of benefit.

7.I agree that the option to have the Morse qualification on their certificate should be maintained.
10. I strongly agree with an entry level test that would replace the current Basic to get more amateurs on the air. The current Basic should be considered the Intermediate qualification.

12. Once again, making the tests harder will not help the hobby, but harm it.

In the RAC recommendation, they compare the pass mark of the amateur radio test to that of a driver's license. Apples and Oranges. An amateur is not going to kill a few dozen people on a sidewalk because he confused the speaker output with the mike input as opposed to the brake and the gas.

I would propose a 3 level license as follows:

1. ENTRY LEVEL- {Foundation} A test of 50 to 100 questions based on operating procedures and rules and regulations with a pass of 50-60%. Low power { under 100 Watts? Maybe under 50 Watts?} in the same frequency range as the current Basic Qualification.

2. INTERMEDIATE QUALIFICATION- This should be the current Basic Qualification with HF privileges. Also being able to use and build KIT Style radios.

3. ADVANCED- This should be left as is.

In conclusion:

Amateur radio is supposed to be a service, not a club. RAC is a club and only represents a portion of its own members. {1400 out of ?}

As a service, it is much better off with a large pool of amateurs. Making the testing harder will not increase this pool, it will decrease it.

Make Amateur Radio more attractive to new generations.

In a civil emergency, if all other forms of communications are out, amateurs are there and can get communications going again. Without them, there would be a lot of miscommunications between authorities.

Either drop the code and make obtaining a license somewhat easier, or leave things the way they are.

As I have stated, most countries are eliminating the code and giving those privileges to the next class down. And they are seeing a jump in the use of the bands. We on the other band, are seeing a decrease.

We need more licensed Amateurs to help further the Hobby/Service and you are now able to put yourself in the position of making this possible.

Sincerely,     Steven LeBlanc

# 19 - Mac Moss
Regarding the notice with respect to the possible elimination of the Morse Code as a condition of licensing or the advanced privileges gained by the knowledge of morse code…. I agree that morse code should be dropped as a pre-requisite to the license. Morse Code is simply a mode of communication like packet, rtty or other digital modes and am, fm, ssb voice modes etc. What is important is that the licensee be knowledgeable concerning radio theory and very knowledgeable concerning the regulations. I feel that it is important as well that the spectrum allocated to morse code and other digital modes be preserved for amateurs who prefer to communicate with this type of technology.

I have been licensed since 1966 and have used all approved modes for most of this time.

Mac Moss

#20 - Jerry and Kay Dixon

Dear Sir,

Attached as a Microsoft Word Document are the September 11th Minutes of the Wolseley

We would like you to consider this proposal as we believe that the Morse code is still an important part of Ham Radio; and this would give the opportunity for people to upgrade, whether they were more interested in learning morse, or studying for a higher mark on the Basic exam.

Yours sincerely

Kay Dixon Repeater Group. The motion below was passed at the meeting and is part of these minutes.

Moved by Jerry, seconded by Henry that the members of the Wolseley Ham Radio Group are in favour of having two choices to upgrade the Basic Amateur Radio Licence to the Intermediate Qualification, either

1. By taking the Basic exam and obtaining 80%. OR
2. By taking a Morse code exam at 5 words per minute and obtaining 100%.

Motion Carried.

WOLSELEY REPEATER GROUP MINUTES.

Saturday 11th September 2004

Fourteen members and four visitors met at the LC Corral Restaurant in Broadview, for a 9:30am breakfast.

Slater and Myrna Tubman, John and Elsie Hugel,
Jerry and Kay Dixon, Wally Pope
Fred Warren, Ken and Jean Stuart, Henry and Dorothy Stanley Murray and Elizabeth Koshchuk

Visitors Harvey Wirth, Dennis Rohlick, and Jake & Darlene Wagner (John and Elsie’s brother and sister in law) were welcomed.

Moved by Fred, seconded by Ken, that the minutes of the May meeting, the June Field Day and the August Picnic be adopted as read. Carried.

Business Arising from Minutes.

1. Slater was not able to contact anyone with SARL to list the club.
2. Jerry still has the 80m dipole for sale.

Treasurer=s Report.

The food bills paid for the Field Day weekend were $162.18 and for the Summer Picnic $34.88
The Bank Balance in the Checking Account is $883.94

Moved by Kay, seconded by Ken, that the Treasurers Report be adopted as read. Carried.

Wally, Dennis and Harvey paid their annual memberships at the end of the meeting.

Slater asked Jerry to compile a list of equipment owned by the club, it is:-
1 Dunestar 20 m Filter
1 48 ft DelHi Tower
1 Cushcraft A35 Beam
1 440 Beam
1 G E Repeater System
1 Motorola Repeater unfinished
1 286 Computer and Repeater Sound Card

New Business.

1. Kay and Jerry talked about their visit to the Manitoba Amateur Radio Museum (MARM) at Austin MB. They were there for the Manitoba Ham Fest in August, and were very impressed with the facility. Kay asked if anyone was interested in starting a Saskatchewan Amateur Radio Museum? Either at Indian Head or Wolseley in conjunction with the town museum’s, but in a separate building? It was noted that Joyce had been contacted by someone from Ohio, USA, about donating all Don’s QSL cards. Fred suggested they should be kept in Sask. and a museum would be a good place. It was decided to think over the idea.
2. The upcoming Industry Canada regulation changes, regarding the dropping of the Morse code from the Amateur exam were discussed.

Moved by Ken, seconded by Harvey that the members of the Wolseley Ham Radio Group are in favour of dropping the code requirement for up-grading the Basic Amateur Radio Licence.

2 for, 8 against, Motion Lost.

Moved by Jerry, seconded by Henry that the members of the Wolseley Ham Radio Group are in favour of having two choices to upgrade the Basic Amateur Radio Licence to the Intermediate Qualification, either
1. By taking the Basic exam and obtaining 80%.  OR
2. By taking a Morse code exam at 5 words per minute and obtaining 100%.

Motion Carried.

Kay was asked to send this motion in to Industry Canada.

3. Jerry described how he had a voice contact with the Space Station in July and talked to Mike Fink, the American astronaut on board. He was also interviewed by Colin Grewar of the CBC Afternoon Show about this contact and Ham Radio. The uplink is 144.490 and for receiving, the downlink is 145.800 on 2 metres. The Space Station now has a repeater operation with uplink 437.800 on 70cm and downlink 145.800.

The next breakfast meeting will be on 23rd October, at the McLean’s Restaurant in Wolseley at 9:30am. The Wolseley Art Show is also on that day.

Moved by John that we adjourn at 11:00am.

Kay Dixon

#21 - Gérard Chartier

Messieurs, je ne suis pas contre le c.w.
Si l on enleve le cw. comme critere, on devrait l enlever sans penaliser les amateurs de la basse.
je vois tres mal habile de donner le hf. a certaines personnes, et le refuser a d autres.
De plus demander un autre examen et obtenir 80 % c est beaucoup trop haut pour certaines personnes.

Aussi il ne faudrait pas oublier surtout 3 elements tres important pour les amateurs de la basse,
1 la note de la premiere examen. 2 l experience acquise depuis. 3 Et surtout ne pas creer de nouvelles barieres entre les amateurs.

a bientot,

Gerard Chartier

#22 - Steven Gagnon

Comments -- Gazette Notice DGRB-003-04

Sept. 24, 2004

I wish Industry Canada to abolish the CW requirement altogether.

The CW mode is a mode that was important for communications world wide up to 10 years ago. With the release of satellite / cell phones, and other technologies, it does not make any sense to continue with this mode and force the Amateur radio community to continue to use this century old mode. I believe that if we keep this CW method in force it will be hard to generate interest in this portion (HF) of the hobby. The Amateur radio community needs to have new young members to secure the HF frequencies for years to come. These new members may wish to learn CW on their own, which would
always be welcomed, respected and protected within the community. With the Internet and cell phones, talking to someone else in the world is no longer a challenge. Younger generations simply do not see Amateur radio as advanced as it was 20 years ago. We need to eliminate most restrictions to this hobby. I support continued Basic exam qualifications to obtain your HF license.

More Code (CW) is currently a restriction to me operating on HF frequencies. When CW is abolished, I will immediately become involved in this new and exciting aspect of the hobby.

Industry Canada has my full support in a quick removal of the CW requirement for HF. I look forward to your forward-thinking decision.

Thank You,

Steven Gagnon

#23 - John White
18 September 2004

Recommendations 1 and 7

Agree.

Recommendation 3

Disagree. Holders of Basic should be grandfathered into HF.

The Basic exam has a very satisfactory HF component. Since ITU has eliminated the need for Morse, the Basic holders now qualify for HF operation.

Recommendation 2

Disagree. As per recommendation 3, holders of Basic with or without Morse qualify for HF. No exam is necessary.

Recommendation 4

Unnecessary if holders of Basic are grandfathered into HF

Recommendation 5
Current proposals ask for 70% (item 6), 75% (item 12), 80% (item 2). This is not a consistent policy. Harmonize the pass marks to one level across all exams. Recommend remaining at 60%.

Recommendation 6

Three questions are posed; three are commented upon,

a) Persons with Basic and Advanced should be given HF privileges.
b) Intermediate class of licence need not exist if Basic qualifies for HF
c) Pass marks on Advanced to remain at 60%

A candidate for the Advanced MUST be a holder of the Basic licence.

Recommendation 8

Holders of Basic, meaning they have HF privileges as argued above, would only be permitted to construct transmitting equipment from commercial kits.

Recommendation 9

Same rule applies as in recommendation 8. Only Advanced to be permitted to construct transmitting equipment. Holders of Basic have not been examined on technical competence in this regard.

Risk of interference to services in the GHz region is no less considerable than in the HF bands.

Recommendation 10

An entry-level exam may have merit. Examination in Regulations, Operating procedures with a practical requirement to demonstrate HT operation. There would only be superficial technical content. The intent is to make Amateur Radio easier to “try out.” Those who find it is not for them do not invest significant time and resources to determine that fact. Privileges would be accordingly limited, perhaps as follows,

1. Handheld VHF radio only
2. Power limited to 5 watts
3. No external antennas or power amplifiers
4. Limited time licence - 1 year non-renewable.
5. Must pass Basic exam to continue to hold a call.
This author recognizes that this may invoke administrative burden on IC and VE’s. This burden must be balanced with the need to attract more candidates into the Amateur service.

Recommendation 11

The Basic exam should consist of three distinctive components - Regulations, Theory, and Operating Procedures. A pass mark, 60%, in Regulations to be a MUST. Overall pass mark still required at 60%.

Recommendation 12

Pass marks to be harmonized across all components, all exams. 

Unaware of any new syllabi. Comments reserved until proposed syllabi released for review.

General Comments in Summary

6. Basic exam, as it exists, is suitable for HF qualification.
7. Advanced exam, as it exists, is suitable for full privileges.
8. Pass marks to remain at 60% across all exams.
9. No Intermediate qualification required.
10. Code endorsements remain available to meet licencing requirements in jurisdictions retaining a code requirement.

In addition,

Amateur Radio, as an experimental or technical hobby, is no longer of interest to most new candidates. Classes indicate that only 1/3 of candidates’ will pursue radio as a hobby. About 1/3 are looking to Amateur Radio to provide marine or land communications for personal or safety purposes, and the remaining 1/3 are involved in emergency services and use Amateur Radio in support of this.

Therefore,

Consider creation of a limited Entry Level qualification.

Review content of current exams in view of Amateur Radio User’s.

Review content of current exams in view of technology change.

Respectfully submitted,

John White

#24 - Mark Osinga

I wish to support the proposal to remove the Morse code requirement for amateur radio status for the following reasons:
1. Many operators are involved in amateur radio for safety reasons (i.e., maritime operators), but who have little use for Morse code. Requirement for use of Morse code presents an unnecessary obstacle to these users to make full use of the amateur radio bands, and who have no intention to use Morse in practice. In short, Morse is but one use of HF radio; it should not preclude an operator from other useful modes.

2. The requirement for Morse appears to be geared to keep ‘novices’ from participating in any useful bands. This requirement then causes the ‘novice’ to spend valuable time which might be better spent learning correct protocols for other modes. In today’s hectic world, time is always an issue.

3. The presumption that knowledge of Morse code endows the operator with expertise beyond the ‘novice’ operator is false. A truer determinant of an operator’s expertise, which would earn the privilege to operate below 29.7 MHz, would be to cause the operator to spend more time learning the proper protocols and operation of HF radio in these lower bands. The best way to effect this is to require evidence of supervised use of these lower bands. This approach is used in many learning environments: drivers must undergo in-car training before being let loose on the roads; most professions require an articling period to learn the trade under the supervision of certified professionals. The current requirement for a Morse test proctored by an advanced operator could easily be changed to a practical experience period, where the ‘novice’ operator is permitted on lower bands only with the more experienced operator present.

4. Eliminating the use of Morse does not mean Morse will die. Those operators who appreciate its benefits will continue to use it. An example is the revolution from horse to train to car. Just because everyone drives a car does not mean we have no further uses for horses or trains. We should not put in place inappropriate obstacles to cause people not be able to drive cars for fear of losing the horses and trains; far better to provide appropriate training for people to safely drive their cars. A further example is the use of the HF radio in the first place - cel phones and sat phones are far cheaper, user friendly, and convenient; yet HF radio use continues to grow.

#25 - Bill Reid

As a radio amateur in Ontario since the early 1990’s, I’ve enjoyed the opportunity to work the VHF and UHF bands. While this is an important part of the spectrum it limits my interest in the hobby.

Due to the Morse code requirement I have been excluded from the exclusive 30 MHz and under club. Over the years I have taken numerous courses and tried home computer based learning in Morse code but have been unable to achieve the mediocre 5 words a minute required. The fact is that some people just don’t have the ability to achieve this goal, yet technically I have been working in the electronics and communications field professionally (Federal Government) for almost 30 years.

I was dragged screaming and kicking into this hobby by my late father Bill Sr. VE3VBC; he convinced me to take a course with him and he’d even pay for it. I did radio work all day and wondered why I would want to do it in my spare time. But I gave it a try and well I grew to love it and now it is time I got a chance to try my hand at the HF side of the hobby that up until last summer seemed nearly impossible to reach.

Therefore I ask that you follow through with the R.A.C. recommendation that C.W. (Morse Code) be eliminated as a requirement to achieve an HF licence.

I do agree with R.A.C. that the written exam pass mark should be increased to 80% for HF privileges,
and in my opinion a pass mark of from 60-79% would entitle them to 6 metre's and up licence. Once the person passes the 80% mark they would be entitled to their HF privileges.

As it turns out this has been a fantastic hobby with many different avenues to follow and hopefully even more in the future.

Lets open the door and see what is behind it!

Sincerely

Bill Reid Jr.

#26 - Douglas Ingold

Concur with the Recommendations as provided by Radio Amateurs of Canada as presented to Industry Canada concerning:


Doug Ingold

#27 - Leigh Arnold

I have some comments and reservations regarding the RAC list of recommendations.

I agree that the Morse qualification should be eliminated as a requisite for operation in the Amateur bands below 30 MHz per the ITU (WRC-2003).

My reservations pertain to the “list of Recommendations” as proposed by the RAC committee.

2. Recommendations 5, 11 and 12 appear to contradict each other. Number 5 requires a pass mark for Basic qualification of 70% yet numbers 11 and 12 suggest that a pass mark of at least 75% is required.

4. Recommendations 2 and 4 call for a pass mark of at least 80% in the Basic exam in order to obtain the Intermediate qualification. This is very close to the 75% required to even pass the Basic exam. Therefore only a 5% difference in exam mark would give operating privileges below 30 MHz.

6. Recommendation 4 gives the option for Basic only holders to re-take the exam in order to achieve Intermediate Qualification with a pass mark of at least 80%. I believe there should be a “grandfather” clause so that persons that previously passed the Basic exam with marks greater than 90% are automatically given Intermediate qualification, without having to re-take the exam.

All radio amateurs, world-wide, should be concerned about our diminishing numbers. We need to recruit more young people and to this end, there are some positive initiatives being made by RAC
and ARRL. I hope that Industry Canada will join in this effort and move quickly to implement the recommendations of WRC-2003.

Regards,
Leigh Arnold

# 28 - Eric Weder

I fully support the RAC proposal to eliminate the Morse code requirement.
Thank you,
Eric

#29 - Jeffrey Dovyak

Comments – Gazette Notice DGRB-003-04

Canada Gazette, Part 1, August 28, 2004, Consultation on “Recommendations from Radio Amateurs of Canada Inc. Concerning Morse Code and Related Matters”

I have struggled with most efficient way for me to respond to the recommendations from Radio Amateurs of Canada (RAC). I have decided that rather than commenting recommendation by recommendation I would just summarize my point of view.

I believe that the current Morse Code Qualification requirement be dropped for operation in the Amateur bands below 30 MHz and that the Intermediate Qualification as recommended by RAC is neither desirable or necessary.

Current holders of the Basic Amateur Qualification should receive access to all Amateur bands, be permitted to construct and use commercial transmitting equipment kits (as well as use their own transmitting equipment at 2.3 GHz and above) and serve as Trustee or Sponsor of Amateur club stations.

If the Government of Canada does decide to proceed with an Intermediate Qualification, Amateurs that hold the current Basic Amateur Qualification for more than one year should be granted the Intermediate Qualification or be deemed to hold the Intermediate Qualification. Many of us that have been licensed for some time did rather well on our Basic examinations – it is not our fault that records of examination scores were not preserved by Industry Canada.

I believe that the pass mark for the basic Amateur Qualification should be set at 70%.

I support the idea that the present Morse Code examination continue for Canadian Amateurs who wish to have that qualification.

I am not convinced that a new entry-level qualification is required but I do not necessarily oppose it. If a new entry level qualification is introduced as well as an Intermediate Qualification I again propose that current Basic Qualification holders be deemed to possess Intermediate Qualification.

I am not convinced that examinations should be divided into discrete elements each requiring a pass mark but if the Government of Canada does proceed in that direction I urge that the pass mark be set no higher than 70% for each element.

Much of the RAC recommendations dealing with Curriculum and Examinations seems to be concern over rote learning and guessing one’s way through an examination. I suggest that the time required to memorize the question bank contents likely exceeds the time required for thorough “proper” study of a
If examination questions are properly structured I do not share RAC’s concern regarding guessing.

In summary then, my opinion is that the Government of Canada should abolish the Morse Code requirement for Amateur operations below 30 MHz, allow current Basic Qualification Amateurs access to all bands, use of commercial “kits”, and sponsorship of Amateur Club stations and that the Intermediate Qualification is not in the best interests of Canadian Amateurs and that if the intermediate Qualification is adopted all current Basic Qualification Amateurs be “grandfathered” to the Intermediate Qualification.

Jeff Dovyak
01 OCT 2004

#30 - Jacques Dontigny

2 octobre, 2004

À qui de droit :

J'ai lu le présent document et je serais d'avis que pour l'accession au bande H.F. ceux qui ont eu 80% et plus pour la licence de base antérieurement devrait être accepté automatiquement sans d'autre formalité, pour ma part depuis plus de 20 ans je fais de l'écoute sur ces bandes et je connais très bien le protocole et l'étique pour ce type de communication.

Salutations distinguées,

Jacques Dontigny

#31 - Frank VanderZande


Note: I have paraphrased RAC’s list of recommendations. I have been an active Amateur Radio Operator since 1962.

**Recommendation 1 – Eliminate the Morse-code Qualification**

I am in full agreement.

Knowledge of morse-code should no longer be used as a pre-requisite for access to HF. I am very active on some of the HF bands and during the last decade I have noticed a massive decline in Canadian HF activity. I would like to see this trend reversed and giving access to this part of the spectrum to all amateurs will probably help to slow down the declining rate of HF use.

**Recommendation 2 – Higher pass marks & a new Intermediate Qualification**

I disagree.
Creating another qualification designed to keep amateurs from using HF spectrum is not necessary. New amateurs who choose to use HF will adapt to this radio environment rapidly. There may be some learn as you go, but that is where the more experienced amateurs can help by example and by offering assistance.

I fail to see how eliminating the morse-code qualification changes the likelihood and impact of adverse effects to amateurs currently using HF. There have been cases of improper and inappropriate operations on HF but I think you will find that for the most part this has had to do more with the character of the persons involved than with how high of a pass mark those persons had obtained.

Dual passing marks for writing the same examination creates an "I am smarter than you" environment. Now everyone passing is treated equally and the marks are not disclosed. The new proposal would create two kinds of amateurs. Those with low marks and those with high marks. The low markers get Basic and the high markers would get Intermediate with the whole world being told on a web site. This is not appropriate.

**Recommendation 3 – Prohibit operators with only Basic Qualification from using HF**

I disagree.

We need more amateurs, especially those with an interest in emergency preparedness and trained in the use of HF. Maintaining unnecessary roadblocks to amateurs for accessing HF radio spectrum is not and has not been justified in the proposal.

**Recommendation 4 – Re-examine Basic Qualification holders with a view to obtaining 80% for obtaining an Intermediate Qualification**

I disagree

Passing the examination should be the only evidence required for demonstrating interest in the hobby and the basic knowledge for using amateur radio equipment in any and all amateur radio bands.

**Recommendation 5 - Increase pass marks for the Basic Qualification to 70%**

I disagree.

It has not been demonstrated that entry to our hobby needs to be more difficult. We need new entrants and those sincerely interested will learn as they go.

**Recommendation 6 – Existing Basic & Advanced qualification holders be allowed to use HF. Future Advanced candidates need to obtain 70% pass mark and pre-requisite of new Intermediate qualification or Basic with Morse Code.**
I disagree

All amateurs with the Basic qualification should be given access to HF spectrum. Additional roadblocks to access HF spectrum is unnecessary.

Recommendation 7 – Continue Morse-code examinations for those who wish to have the qualification.

I disagree

When the morse-code qualification is removed from regulations, this ability does not need to be tested by the regulator. The role for recognizing morse-code ability should be with Amateur organizations.

Recommendation 8 – Intermediate Qualification holders may construct and use commercial transmitting equipment kits

I disagree

I recommend that all Basic Qualification holders be allowed to construct and use commercial transmitting equipment kits.

Recommendation 9 – Intermediate Qualification holders be permitted to construct and use their own equipment at 2.3 GHz and above

I disagree

I disagree with the concept of adding the proposed Intermediate Qualification.

Recommendation 10 – New entry level qualification be introduced.

I somewhat agree

If a new entry level qualification should be introduced, suggest that power and antenna restrictions be used to encourage new entrants to progress to Basic and Advanced.

Alternatively, perhaps the syllabus and question bank for the Basic Qualification be changed so that the examination concentrates more on regulations, operating procedures and safety issues with a lesser emphasis on technical aspects.

Recommendation 11 - New syllabus be divided into several elements and pass mark be required on every element.
I disagree

The syllabus and question banks should be updated and be improved. Question banks can be expanded and the negative type questions should be eliminated. However, I think the current syllabus and question banks are reasonably good for examinations. I don’t think it is necessary to break up the examination into separate parts with their own pass marks.

Recommendation 14 – Pass marks on all elements be set at 75%

I disagree

I am not aware of any evidence that candidates passing with a lower grade (eg. 60-74) are a problem for the amateur radio service. Higher pass marks are not necessary.

Sincerely,
Frank VanderZande

#32 - John Bridgman

AS an amateur operator I have enjoyed HF communications over the years and passing the tests did not make me the operator that I am, it is respect for others and using the proper procedures that I learned on the air from older hams and by observing others.

I agree that the code requirement be dropped but the pass mark should stay the same. The holders of the basic qualification studied in good faith and should not be penalized for going by the rules. If they must rewrite than everyone should rewrite as there are some operators that never wrote the advanced qualifications to get there qualifications as they were grand fathered.

Only holders of the advanced qualification should be permitted to build their own equipment especially above 900 MHZ. As there is more danger of an accident with RF burns and on hf the generation of harmonics can be very tricky to shield and suppress if proper care isn’t used.

Ric 2 starts off with the intent of amateur radio being for the use of ordinary people not as all scientific people.

John Bridgman

#33 - Don J. Bourne

Note: I have paraphrased RAC’s list of recommendations. I have been an active Amateur Radio Operator since 2003.

Recommendation 1 – Eliminate the Morse-code Qualification

I am in full agreement.
The only reason that Morse code was a requirement in the past was that it was required by the international community. Morse code is no longer required, so it should be dropped as a requirement.

**Recommendation 2 – Higher pass marks & a new Intermediate Qualification**

I disagree.

The standard pass mark for passing any exam has been 65%. The pass mark should remain at that point.

**Recommendation 3 – Prohibit operators with only Basic Qualification from using HF**

I disagree.

All licensed amateurs with basic should be given rights to operate on HF with no restriction. They can learn as they go just like I did.

**Recommendation 4 – Re-examine Basic Qualification holders with a view to obtaining 80% for obtaining an Intermediate Qualification**

I disagree.

Passing the examination with 65% should be the only requirement to obtaining an amateur radio License.

**Recommendation 5 - Increase pass marks for the Basic Qualification to 70%**

I disagree.

It should not be more difficult. We need new entrants and those sincerely interested will learn as they go just as all of us have.

**Recommendation 6 – Existing Basic & Advanced qualification holders be allowed to use HF. Future advanced candidates need to obtain 70% pass mark and pre-requisite of new Intermediate qualification or Basic with Morse code.**

I disagree.

All amateurs with the Basic qualification should be on HF
Recommendation 7 – Continue Morse-code examinations for those who wish to have the qualification.

I disagree

When the Morse-code qualification is removed from regulations, this ability does not need to be tested by the regulator. The role for recognizing Morse-code ability should be with Amateur organizations.

Recommendation 8 – Intermediate Qualification holders may construct and use commercial transmitting equipment kits

I disagree

I recommend that all Basic Qualification holders be allowed to construct and use commercial transmitting equipment kits. This is how we learn.

Recommendation 9 – Intermediate Qualification holders be permitted to construct and use their own equipment at 2.3 GHz and above

I disagree

I disagree with the concept of adding the proposed Intermediate Qualification.

Recommendation 10 – New entry level qualification is introduced.

I somewhat agree

If a new entry level qualification should be introduced, suggest that power and antenna restrictions be used to encourage new entrants to progress to basic and advanced.

Alternatively, perhaps the syllabus and question bank for the Basic Qualification be changed so that the examination concentrates more on regulations, operating procedures and safety issues with a lesser emphasis on technical aspects.

Recommendation 11 - New syllabus be divided into several elements and pass mark be required on every element.

I disagree
The syllabus and question banks should be updated and be improved. Question banks can be expanded and the negative type questions should be eliminated. However, I think the current syllabus and question banks are reasonably good for examinations. I don’t think it is necessary to break up the examination into separate parts with their own pass marks.

Recommendation 14 – Pass marks on all elements be set at 75%

I disagree

I am not aware of any evidence that candidates passing with a lower grade (e.g. 60-74) are a problem for the amateur radio service. Higher pass marks are not necessary.

Respectfully submitted
Don J. Bourne

#34 - John Broomhall
Recommendation 1 - Eliminate the Morse-code Qualification

Agreed. I do not believe that Morse code, or any other capability beyond the basic exam, should be used as a gate to using HF frequencies. There is a unjustifiable need by some amateurs to put HF communications on a higher plane, requiring an additional test of worthiness before access is permitted. There is little or no evidence that getting a Morse code qualification made anyone a better HF operator, or kept poor operators out. The additional qualification only served to keep people out, regardless of potential proficiency.

All remaining recommendations - I disagree.

Using a two-tiered approach (Basic, Intermediate) based on exam marks, or marks within exam categories will only serve the misguided assumption that a higher mark would somehow ensure future HF operating proficiency.

There is no need for an intermediate category, therefore, all privileges proposed to be associated with an intermediate category are moot.

Access to all amateur frequencies should be permitted after passing the current test, with the current pass mark. Amateur radio has always been very much a peer-monitored interest. It will remain so with new users of HF
frequencies.

John Broomhall

#35 - Dick and Kathy Hobbis

Note: I have paraphrased RAC's list of recommendations. I have been an active Amateur Radio Operator since 1962.

2. **Recommendation 1 - Eliminate the Morse-code Qualification**

I am in full agreement.

Knowledge of morse-code should no longer be used as a pre-requisite for access to HF. I am very active on some of the HF bands and during the last decade I have noticed a massive decline in Canadian HF activity. I would like to see this trend reversed and giving access to this part of the spectrum to all amateurs will probably help to slow down the declining rate of HF use.

**Recommendation 2 - Higher pass marks & a new Intermediate Qualification**

I disagree.

Creating another qualification designed to keep amateurs from using HF spectrum is not necessary. New amateurs who choose to use HF will adapt to this radio environment rapidly. There may be some learn as you go, but that is where the more experienced amateurs can help by example and by offering assistance.

I fail to see how eliminating the morse-code qualification changes the likelihood and impact of adverse effects to amateurs currently using HF. There have been cases of improper and inappropriate operations on HF but I think you will find that for the most part this has had to do more with the character of the persons involved than with how high of a pass mark those persons had obtained.

Dual passing marks for writing the same examination creates an "I am smarter than you" environment. Now everyone passing is treated equally and the marks are not disclosed. The new proposal would create two kinds of amateurs. Those with low marks and those with high marks. The low markers get Basic and the high markers would get Intermediate with the whole world being told on a web site. This is not appropriate.

**Recommendation 3 - Prohibit operators with only Basic Qualification from using HF**

I disagree.

We need more amateurs, especially those with an interest in emergency preparedness and trained in the use of HF. Maintaining unnecessary roadblocks to amateurs for accessing HF radio spectrum is not and has not been justified in the proposal.

**Recommendation 4 - Re-examine Basic Qualification holders with a view to obtaining 80% for obtaining an Intermediate Qualification**

I disagree

Passing the examination should be the only evidence required for demonstrating interest in the hobby and the basic knowledge for using amateur radio equipment in any and all amateur radio bands.

**Recommendation 5 - Increase pass marks for the Basic Qualification to 70%**
I disagree.

It has not been demonstrated that entry to our hobby needs to be more difficult. We need new entrants and those sincerely interested will learn as they go.

**Recommendation 6 - Existing Basic & Advanced qualification holders be allowed to use HF. Future Advanced candidates need to obtain 70% pass mark and pre-requisite of new Intermediate qualification or Basic with Morse Code.**

I disagree

All amateurs with the Basic qualification should be given access to HF spectrum. Additional roadblocks to access HF spectrum is unnecessary.

**Recommendation 7 - Continue Morse-code examinations for those who wish to have the qualification.**

I disagree

When the morse-code qualification is removed from regulations, this ability does not need to be tested by the regulator. The role for recognizing morse-code ability should be with Amateur organizations.

**Recommendation 8 - Intermediate Qualification holders may construct and use commercial transmitting equipment kits**

I disagree

I recommend that all Basic Qualification holders be allowed to construct and use commercial transmitting equipment kits.

**Recommendation 9 - Intermediate Qualification holders be permitted to construct and use their own equipment at 2.3 GHz and above**

I disagree

I disagree with the concept of adding the proposed Intermediate Qualification.

**Recommendation 10 - New entry level qualification be introduced.**

I somewhat agree

If a new entry level qualification should be introduced, suggest that power and antenna restrictions be used to encourage new entrants to progress to Basic and Advanced.

Alternatively, perhaps the syllabus and question bank for the Basic Qualification be changed so that the examination concentrates more on regulations, operating procedures and safety issues with a lesser emphasis on technical aspects.

**Recommendation 11 - New syllabus be divided into several elements and pass mark be required on every element.**

I disagree

The syllabus and question banks should be updated and be improved. Question banks can be expanded and the negative type questions should be eliminated. However, I think the current syllabus and question banks are reasonably good for examinations. I don't think it is necessary to break up the examination into separate parts with their own pass marks.
Recommendation 14 - Pass marks on all elements be set at 75%

I disagree

I am not aware of any evidence that candidates passing with a lower grade (eg. 60-74) are a problem for the amateur radio service. Higher pass marks are not necessary.

Sincerely,

Richard L. Hobbis

#36 - Mike Kelly

The following are my comments on the recommendations from RAC. As an accredited examiner, I get to observe candidates studying for the exams, the examination results, and the on air behavior of those candidates who are successful.

Recommendation 1 (Drop Morse requirement) Agree. As a "filter" it doesn't work. My preference is to ensure a candidate can "do" something rather than just "know" something, but I realise this would be harder to test. The dropping of Morse MUST be coupled with other changes, as recommended. If the other changes are not made, keep the Morse test as it is now.

Recommendation 2 (allow HF operation to those passing Basic exam with 80%) Agree, with additional provision that those who can prove they have already achieved 80% in the exam be permitted to operate in the bands below 30 MHz. This proof could be their copy of form IC2381 "Application and report for amateur radio operator certificate and call sign, or other proof acceptable to the department.

Recommendation 3 (Current Basic qualifications allow operation above 30MHz only) Agree. This would need wide spread publicity, otherwise people will hear what they want to hear.

Recommendation 4 (Basic holders who re-test and achieve 80% can operate below 30MHz) Agree. It should be noted that if Recommendation 7 is followed, Basic holders have two routes to HF operation.

Recommendation 5 (Raise Basic pass mark to 70%) Agree. The mark should go at least this high, as soon as possible, regardless of other changes. This and recommendation 11 are related, and can be considered as one.

Recommendation 6a (Holders of basic Basic plus Advanced to operate below 30MHz) Agree. Of people I have examined, the lowest mark achieved on the basic exam for someone who subsequently passed the Advanced exam was 82%. Therefore a pass in the advanced exam is a good indicator that the candidate could have qualified for the Intermediate qualification.

Recommendation 6b (candidates for Advanced exam should have Intermediate or equivalent)
Disagree. This is a minor point, but someone who is interested in the technical aspects of the service may still score poorly on the Basic exam. This should not prevent them from writing the Advanced exam. If someone passed a Basic exam with a 60% are they more qualified to write an Advanced exam because they passed a Morse test?

Recommendation 6C (candidates for Advanced exam must achieve 70% to pass)
Agree. Of the 19 Advanced exam scores currently in my records, only two achieved a mark between 60 and 70%, therefore a change in the pass mark would change little. The pass mark should be the same for the Intermediate and Advanced exams. Eventually this would go to 75% on multiple elements, as per recommendation 12.

Recommendation 7 (Morse exams continue to be available) Agree. The requirement may need to have a "sunset clause" attached to it, but until a better solution to the problem of reciprocal licencing can be found, a morse option should stay. I think (without evidence) that it is easier for some (younger) candidates to pass a Basic and Morse exam than it is to pass a more difficult technical examination.

Recommendation 8 (Intermediate qualification holders permitted to build transmitter kits)
Agree. Even if the Intermediate qualification was achieved by holding a current Basic (60% pass mark) and Morse qualification, they should be allowed to build kits. They are already supposed to be familiar with basic safety skills.

Recommendation 9 (Intermediate holders permitted to build transmitters over 2.3GHz)
Disagree. The candidate will not have proven competence in transmitter design, or in the use of test equipment to the level required for this task. In future the microwave portion of the spectrum will become at least as crowded as the lower frequencies, requiring careful attention to the technical characteristics of the radiated signal. Although we should encourage the use of this spectrum, this is not the way to do it.

Recommendation 10 (new entry level licence) Agree. The current Basic, with a 70% pass mark, or a new licence that emphasises operating procedures and regulations would be appropriate.

Recommendation 11 (new syllabus, pass required on each element) Agree with both ideas. The question bank should also be enlarged. If someone can memorize the answers to 100 questions on each of 25 different subjects, they have probably learned enough in the process to have a legitimate claim to the qualification.

Recommendation 12 (raise pass mark on each element to 75% once new syllabi are in place)
Agree. The exams must be set up so that guessing, or repeated attempts are not enough to pass.

Thank you
Mike Kely

#37 - Richard & Lorna Howes
Dear Sir/Madam,
I have been an active Amateur Radio Operator since 1972 and an enthusiastic proponent of Morse Code as a valuable skill. Here follow my comments on the subject of Amateur Radio licensing and Morse Code. RAC’s recommendations have been paraphrased for the sake of convenience.

**Recommendation 1 – Eliminate the Morse-code Qualification**

Agree.

Knowledge of Morse Code should no longer be necessary as a pre-requisite for access to HF. The Morse Code requirement is regarded by many folk nowadays as an archaic mode which has undoubtedly served as a barrier to many who might otherwise seek to qualify as Radio Amateurs with the consequent negative impact on our numbers.

**Recommendation 2 – Higher pass marks & a new Intermediate Qualification**

Disagree.

Creating yet another qualification designed to keep amateurs from using HF spectrum is not necessary or desirable. We should be seeking ways to simplify the process of becoming an Amateur Radio Operator not complicating it yet further.

I fail to see how eliminating the Morse Code qualification changes the likelihood and impact of adverse effects to amateurs currently using HF. Improper and inappropriate operations on HF will always occur. This has more to do with the character of the offender than pass mark achieved in a test.

The new proposal would create two kinds of amateurs, those with low marks and those with high marks. The low markers get Basic and the high markers would get Intermediate with the whole world being told on a web site. This is not acceptable.

**Recommendation 3 – Prohibit operators with only Basic Qualification from using HF**

Disagree.

We need more amateurs, especially those with an interest in emergency preparedness and trained in the use of HF. Maintaining unnecessary roadblocks to amateurs for accessing HF radio spectrum is not and has not been justified in the proposal.

**Recommendation 4 – Re-examine Basic Qualification holders with a view to obtaining 80% for obtaining an Intermediate Qualification**

Disagree

Passing the examination should be the only evidence required for demonstrating interest in the hobby and the basic knowledge for using amateur radio equipment in any and all amateur radio bands.

**Recommendation 5 - Increase pass marks for the Basic Qualification to 70%**

Disagree.

It has not been demonstrated that entry to the Amateur Radio Service needs to be more difficult. The purpose of the test is to ensure that a basic level of knowledge has been gained. A relatively small increase in the pass mark is hardly any guarantee of significantly more knowledge or better operating habits any more than the requirement for Morse Code proficiency does.

**Recommendation 6 – Existing Basic & Advanced qualification holders be allowed to use HF. Future Advanced candidates need to obtain 70% pass mark and pre-requisite of new Intermediate qualification or Basic with Morse Code.**
Disagree
All amateurs with the Basic qualification should be given access to HF spectrum. Additional roadblocks to access HF spectrum are unnecessary and undesirable.

Recommendation 7 – Continue Morse Code examinations for those who wish to have the qualification.
Disagree
When the Morse Code qualification is removed from regulations, this ability need no longer be tested by the regulator. Recognition of Morse Code proficiency should be left to Amateur organizations.

Recommendation 8 – Intermediate Qualification holders may construct and use commercial transmitting equipment kits
Disagree
All Basic Qualification holders should be allowed to construct and use commercial transmitting equipment kits.

Recommendation 9 – Intermediate Qualification holders be permitted to construct and use their own equipment at 2.3 GHz and above
Disagree
I do not support adding the proposed Intermediate Qualification.

Recommendation 10 – New entry level qualification be introduced.
Qualified Agree
If a new entry level qualification is introduced the exam should focus on regulations, operating procedures and safety issues with a lesser emphasis on technical aspects with transmitter power and antenna restrictions used to encourage new entrants to progress to Basic and Advanced.

Recommendation 11 - New syllabus be divided into several elements and pass mark be required on every element.
Qualified Agree
Dividing the exam into three segments: Regulations, Operating and Safety and Technical and requiring the pass mark in each one separately be achieved is acceptable, but no further complication is necessary or desirable.

Recommendation 14 – Pass marks on all elements be set at 75%
Disagree
I do not believe raising the pass mark above its present level will have any material effect on the operating standards and technical knowledge of new Amateur Radio Operators. Higher pass marks are not necessary.
I trust you will find this a helpful and constructive contribution to your deliberations on the subject.

Yours faithfully,
Richard Howes
VE7RFH

#38 - Cliff Linton
I think RAC's proposal is very well thought out and I endorse it whole heartedly.

Cliff Linton

#39 - Gilbert Roy

Bonjour,

Je ne suis pas d'accord à 100% avec la recommandation #4 de RAC.

Les amateurs qui ont réussi l'examen de base avec 80% ou plus devrait être exonérés de se requalifier pour la classe intermédiaire.

Ici je parle de l'examen de base qui a été révisé et qui est en vigueur en ce moment depuis quelques années.

Dans mon cas j'ai réussi l'examen en janvier 2002 avec 81% avec beaucoup de travail et d'étude et je ne vois pas pourquoi je serais pénalisé à refaire le même examen.

Gilbert Roy

#40 - Tony

Note: With permission from Frank, VE7AV, I have used parts of his submission which some of my changes.

Below is a paraphrased RAC's list of recommendations. I have been an active Amateur Radio Operator since 1990.

Recommendation 1 - Eliminate the Morse-code Qualification

I am in full agreement.

Knowledge of morse-code should no longer be used as a prerequisite for access to HF. I am very active on some of the HF bands and during the last decade I have noticed a massive decline in Canadian HF activity. I would like to see this trend reversed and giving access to this part of the spectrum to all amateurs will probably help to slow down the declining rate of HF use.

Recommendation 2 - Higher pass marks & a new Intermediate Qualification

I disagree.

Generally, examinations are different at other sittings and one may achieve higher/lower grades in one area such as antennas/propagation or regulations, etc. Does that make a better operator to constitute a different level of license?
Creating another qualification designed to keep amateurs from using HF spectrum is not necessary. New amateurs who choose to use HF will adapt to this radio environment rapidly. There may be some learning as you go, but that is where the more experienced amateurs can help by example and by offering assistance.

I fail to see how eliminating the morse-code qualification changes the likelihood and impact of adverse effects to amateurs currently using HF. There have been cases of improper and inappropriate operations on HF but I think you will find that for the most part this has had to do more with the character of the persons involved than with how high of a pass mark those persons had obtained.

Dual passing marks for writing the same examination creates an "I am smarter than you" environment. At the present, everyone passing is treated equally and the marks are not disclosed. The new proposal would create two kinds of amateurs. Those with low marks and those with high marks. The low markers get Basic and the high markers would get Intermediate with the whole world being told on a web site. This is not appropriate.

Recommendation 3 - Prohibit operators with only Basic Qualification from using HF

I disagree.

We need more amateurs, especially those with an interest in emergency preparedness and trained in the use of HF. Maintaining unnecessary roadblocks to amateurs for accessing HF radio spectrum is not and has not been justified in the proposal.

Recommendation 4 - Re-examine Basic Qualification holders with a view to obtaining 80% for obtaining an Intermediate Qualification

I disagree

Passing the examination should be the only evidence required for demonstrating interest in the hobby and the basic knowledge for using amateur radio equipment in any and all amateur radio bands.

Recommendation 5 - Increase pass marks for the Basic Qualification to 70%

I disagree.

It has not been demonstrated that entry to our hobby needs to be more difficult. We need new entrants and those sincerely interested will learn as they go.

Recommendation 6 - Existing Basic & Advanced qualification holders be allowed to use HF. Future Advanced candidates need to obtain 70% pass mark and prerequisite of new Intermediate qualification or Basic with Morse Code.

I disagree

All amateurs with the Basic qualification should be given access to HF
spectrum. Additional roadblocks to access HF spectrum is unnecessary.

Recommendation 7 - Continue Morse-code examinations for those who wish to have the qualification.

I disagree

When the morse-code qualification is removed from regulations, this ability does not need to be tested by the regulator. The role for recognizing morse-code ability should be with Amateur organizations.

Recommendation 8 - Intermediate Qualification holders may construct and use commercial transmitting equipment kits

I disagree

I recommend that all Basic Qualification holders be allowed to construct and use commercial transmitting equipment kits.

Recommendation 9 - Intermediate Qualification holders be permitted to construct and use their own equipment at 2.3 GHz and above

I disagree

I disagree with the concept of adding the proposed Intermediate Qualification.

Recommendation 10 - New entry level qualification be introduced.

I somewhat agree

If a new entry level qualification should be introduced, suggest that power and antenna restrictions be used to encourage new entrants to progress to Basic and Advanced.

Alternatively, perhaps the syllabus and question bank for the Basic Qualification be changed so that the examination concentrates more on regulations, operating procedures and safety issues with a lesser emphasis on technical aspects.

Recommendation 11 - New syllabus be divided into several elements and pass mark be required on every element.

I disagree

The syllabus and question banks should be updated and be improved. Question banks can be expanded and the negative type questions should be eliminated. However, I think the current syllabus and question banks are reasonably good for examinations. I don't think it is necessary to break up the examination into separate parts with their own pass marks.

Recommendation 14 - Pass marks on all elements be set at 75%

I disagree
This is not a doctorate, but simply a wonderful hobby that needs some
knowledge and understanding. I am not aware of any evidence that candidates passing with a lower grade (eg. 60-74) are a problem for the amateur radio service. Higher pass marks are not necessary.

Regards,

Tony

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#41 - Ken Tucker

**Comments-Gazette Notice DGRB-003-04**

The following are my comments concerning the present proposal from RAC to IC concerning Morse Code and related matters.

I **support fully** the recommendation #1 that the current Morse Code Qualification be dropped as a requirement for operation in all bands below 30Mhz. Also I support the recommendations outlined in number 5 through to number 12 of the proposal.

However I **do not** totally agree with the recommendations proposed in numbers 2, 3 and 4 concerning present holders of the Basic Qualification. I suggest that Industry Canada seriously consider other options for holders of the Basic Qualification other than those proposed. Here is one option that I think is worth consideration, the present Basic Qualification holders who passed the Basic exam since the revised syllabus in RIC-3 in 2001 with a mark of at least 80% should be deemed into the new proposed Intermediate Qualification. I refer you to page 15, paragraph one under the heading Intermediate syllabus of the RAC proposal. It reads as follows: Industry Canada published a revised Basic syllabus in RIC-3 in 2001, replacing the previous syllabus appearing in RIC-24, last issued in 1997. Inspection of this syllabus will reveal that it is quite comprehensive of the topics of HF operation, although some topics, such as modern digital modes, should be added. It is closely equivalent to the US General syllabus and the UK Intermediate syllabus which carry HF privileges. An examination based on this syllabus taken in conjunction with our recommended increase in pass mark discussed below, is therefore an adequate test for the proposal for the new Intermediate Qualification.

In my opinion this clearly justifies and supports my suggestion as mentioned above, I myself passed the Basic Exam with a mark above 80% this past April, referring to the paragraph above concerning the Intermediate syllabus I think all persons who hold the Basic Qualification the same as myself should be grandfathered or deemed into the proposed Intermediate Qualification and permitted to access the HF bands without having to write another exam. For the most part I believe that current holders of the Basic Qualifications are well prepared to operate within the HF bands and every effort should be made to encourage the Basic Qualification holders to advance to the HF privileges.

Since becoming involved with Amateur radio I have heard or read articles where there is a concern about the declining interest in the hobby. With modern technology advancing at a fast pace one would think fewer newcomers will show an interest in radio operations such as HF or CW. There is a core of radio operators out there waiting to have the opportunity to operate voice in the HF bands, they are the present Basic Qualification holders. These people should be encouraged in every way possible and should not be required to take more exams, etc. By giving them a fair chance to participate in the HF bands these people will bring a new level of participation that will be a big step to ensure the future of Amateur radio operations for many years to come.

*Ken Tucker  
VO1KVT*

#42 - Edward Horton

To who it may concern;

I read the proposed changes to morse code. As I understand there are to be three levels for Amateur radio. There is a Basic, Intermediate, and Advance. This may help bring more people into the hobby.

I currently hold a basic qualification for amateur radio. My idea for a proposal is, if a Amateur radio operator is a member of ARES, and has been for a set number of years, or they hold more than one radio operators license, they should be placed in the Intermediate level.

This would be do to the fact, that some one in that position, has learned how to use various radios, or various methods.
As per the ability to build kits. Some Amateurs may not wish to build kits, either to time constraints, or other reasons. So how about moving the ability to build kits to Advanced level.

These are just my ideas, any responses to this would be great.

Thank you

Edward I. Horton

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#43 - Frank VanderZande

Sixteen members of the Prince George Amateur Radio Club (Society incorporated in BC) attended the club’s monthly meeting on October 5, 2004 and discussed the RAC proposal at length. Members were asked if they agreed or disagreed with each of the 12 recommendations made by RAC. The following is a list of members in attendance followed by voting results.

Members voting were:

VA7PG, VA7BRU, VA7ART, VA7KT, VA7VB, VA7RC, VE7BUV, VE7LUS, VE7ENS, VE7PGK, VE7DRR, VE7ATC, VE7LYA, VE7EQU, VE7DRS, VE7AV.

Recommendation 1 - 12 Agree 4 Disagree
Recommendation 2 - 6 Agree 10 Disagree
Recommendation 3 - 0 Agree 16 Disagree
Recommendation 4 - 0 Agree 16 Disagree
Recommendation 5 - 10 Agree 6 Disagree
Recommendation 6 - 0 Agree 16 Disagree
Recommendation 7 - 4 Agree 12 Disagree
Recommendation 8 - 2 Agree 14 Disagree
Recommendation 9 - 0 Agree 16 Disagree
Recommendation 10 - 3 Agree 13 Disagree
Recommendation 11 - 0 Agree 16 Disagree
Recommendation 12 - 0 Agree 16 Disagree

The majority of amateurs present clearly support the elimination of the Morse code Qualification. It was also clear that the majority present did not agree with the proposal to introduce other Qualifications.

With regards to recommendation 8, there would be wide support for a proposal, which gave the ability to Basic Qualification holders to build and use commercial transmitting equipment kits. The high vote against this proposal was due to little support for the Intermediate Qualification concept.

With regards to recommendation 10, there was an indication of support if the Basic Qualification syllabus
were to be amended to emphasize the topics dealing with regulations, operating procedures and safety and less emphasis on the more difficult technical theory. Elimination of negative type questions from the question bank was also urged. There was little support for another separate qualification.

Submitted by

Frank VanderZande
Secretary
Prince George Amateur Radio Club

#44 - Michel Lefebvre - Jacques Blais

Lundi 11 octobre 2004

Réf.: Avis de la Gazette no DGRB-003-04
Réf.: Commentaire de RAC

Voici nos commentaires par rapport aux recommandations de RAC concernant l'abolition du code morse au Canada.

Recommandation 1

Le club de Radioamateur de Grand-Mère inc. (VE2RGM) appui cette recommandation mais nous ne croyons pas comme les commentaires de RAC le laisse supposé de l'utilisation inadéquate des équipements radioamateur. Une publication sous forme de CIR et/ou de publicités par les différentes associations de radioamateur donnerais de l'information sur le volet technique des bandes HF.

Recommandation 2

Nous sommes en profond désaccord à établir un pourcentage autre que celui déjà en vigueur qui est de 60% pour la licence de base et encore moins à créer une nouvelle classe de radioamateur. Nous donnons un privilège à tous ou nous ne le donnons pas. Concernant la préparation aux bandes HF rien de mieux que l'expérience sur le terrain pour les approfondir.

Recommandation 3,4,5,6

Comme mentionné plus haut, aucune création de nouvelle classe et de pourcentage supérieur de devrait être créer.

Recommandation 7

Nous croyons que de donner la possibilité à ceux et celles qu'ils le désirent la possibilité de quand même passé un examen en code morse est excellent et même souhaiter. Mais parcontre de faire des radioamateurs des techniciens en électroniques n'est pas le but de la radioamateur.

Recommandation 8,9,10,11

L'augmentation de la note de passage pourrait être rehaussée de façon progressive sur une période 3 années pour l'amener aux standards de certains pays mais encore là nous ne recommandons pas cette approche.

Pour conclure, nous souhaitons l'abolition du code morse, nous donnant ainsi accès à la bande HF et nous sommes en faveur de publication de références techniques qui serait distribué aux radioamateurs mais de créer une nouvelle classe de radioamateur et exigé des pourcentages aussi élevé que 80% nous sommes contre cette avenue. Parcontre tous ceux et celles qui auraient eu une note de passage à 70% à leur examen de base pourrait se voir offrir d'aller sur la bande HF. Et pour toutes les autres, un délai de 1 à 2 années
Hello my name is Tom Domonkos and my call is VE3LT located in Niagara Falls Ontario. 

I have read the proposed outlines regarding the changes to be made in the licensing of new Hams in Canada. Although I applaud these efforts, I feel that there are a few points that could be clarified. The CW (Morse) requirement should go. Existing basic licensees should be granted HF privileges immediately. By definition the theory and regulatory content of the basic exam meet the government requirements for HF operation.

The RAC proposals are unrealistic in requiring people who have passed the basic exam to be retested at a new level. Qualifications should be respected. High school curricula and degree requirements change over time. However, we are not required to re-qualify for our high school diploma or our degrees. Amateur radio should be no different.

As a long time teacher of the local Amateur Radio Course in our area, I really don't like the idea of some kind of endorsement by current licensees. Because of individual biases, there is a lot of room for discrimination and plain unfairness. Further, the amateur community is fractious and has difficulty in maintaining a national organization. Introducing these attitudes to the licensing process won't help and may discourage future candidates. Making a higher grade of 70% is unrealistic as well as this would impede the influx of many potential new young Hams to the hobby. The current structure of basic and advanced licenses is sufficient. A good licensing course can provide enough material to allow a candidate to pass both exams on the same night. Amateur Radio Clubs and individual instructors should concentrate on providing this quality of course. (I know I consciously do!) An entry-level license is unnecessary. So is creating a multi tiered system to evoke elitism amongst the ranks.

The license, the way it is now or in the future, is an entry to the hobby. Current licensees, Instructors and local Clubs can mentor new entries if they wish. This is the best way to pass on values and practices. However, if they want a formal role in licensing, they should undertake some commitments in terms of national coverage and consistency of approach. A good operator in not one who gets perfect on a test, but one who is a responsible operator by the teachings of a caring "Elmer" or by noticing other Hams operating procedures.

Some of the comments in the RAC listings need to be tweaked as well. For example I will paraphrase the proposal and then give my opinions as follows;

**Recommendation 1 – Eliminate the Morse Code Qualification**

I am in full agreement.
Knowledge of Morse Code should no longer be used as a pre-requisite for access to HF. I listen to the HF bands and during the last decade I have noticed a massive decline in Canadian HF activity. I would like to see this trend reversed and giving access to this part of the spectrum to all amateurs will probably help to slow down the declining rate of HF use.

Recommendation 2 – Higher pass marks & a new Intermediate Qualification

I disagree.

Creating another qualification designed to keep amateurs from using HF spectrum is not necessary. New amateurs who choose to use HF will adapt to this radio environment rapidly. There may be some learn as you go, but that is where the more experienced amateurs can help by example and by offering assistance.

I fail to see how eliminating the Morse Code qualification changes the likelihood and impact of adverse effects to amateurs currently using HF. There have been cases of improper and inappropriate operations on HF but I think you will find that for the most part this has had to do more with the character of the persons involved than with how high of a pass mark those persons had obtained.

Dual passing marks for writing the same examination creates an "I am smarter than you" environment. Now everyone passing is treated equally and the marks are not disclosed. The new proposal would create two kinds of amateurs. “Those with low marks and those with high marks”. The low markers get Basic and the high markers would get Intermediate with the whole world being told on a web site. This is not appropriate. I never agreed with the old 5, 10 or 12 or whatever speed would be listed previously for Code proficiency either! Who cares if you can copy 35 WPM as long as you know the alphabet?

Recommendation 3 – Prohibit operators with only Basic Qualification from using HF

I disagree.

We need more amateurs, especially those with an interest in emergency preparedness and trained in the use of HF. Maintaining unnecessary roadblocks to amateurs for accessing HF radio spectrum is not and has not been justified in the proposal.

Recommendation 4 – Re-examine Basic Qualification holders with a view to obtaining 80% for obtaining an Intermediate Qualification

I disagree

Passing the examination should be the only evidence required for demonstrating interest in the hobby and the basic knowledge for using amateur radio equipment in any and all amateur radio bands.

Logistically speaking it would be impossible or yet unattainable to get 15-20 thousand Canadian Licensed Amateurs to re-write their basic exam for the new proposed “Intermediate level”

Recommendation 5 - Increase pass marks for the Basic Qualification to 70%

I disagree.
It has not been demonstrated that entry to our hobby needs to be more difficult. We need new entrants and those sincerely interested will learn as they go.

Recommendation 6 – Existing Basic & Advanced qualification holders be allowed to use HF. Future Advanced candidates need to obtain 70% pass mark and pre-requisite of new Intermediate qualification or Basic with Morse Code.

I disagree

All amateurs with the Basic qualification should be given access to HF spectrum. Additional roadblocks to access HF spectrum is unnecessary. A decade ago many licensees were grandfathered and most turned out to be good operators. The same mentality is repeating itself of doom and gloom for the HF bands that occurred a decade ago!

Recommendation 7 – Continue Morse Code examinations for those who wish to have the qualification.

I disagree

When the Morse Code qualification is removed from regulations; this ability does not need to be tested by the regulator. The role for recognizing Morse Code ability should be with Amateur organizations.

Recommendation 8 – Intermediate Qualification holders may construct and use commercial transmitting equipment kits

I disagree

I recommend that all Basic Qualification holders be allowed to construct and use commercial transmitting equipment kits.

Recommendation 9 – Intermediate Qualification holders be permitted to construct and use their own equipment at 2.3 GHz and above

I disagree

I disagree with the concept of adding the proposed Intermediate Qualification.

Recommendation 10 – New entry level qualification be introduced.

I somewhat agree

If a new entry level qualification should be introduced, suggest that power and antenna restrictions be used to encourage new entrants to progress to Basic and Advanced.

Alternatively, perhaps the syllabus and question bank for the Basic Qualification be changed so that the examination concentrates more on regulations, operating procedures and safety issues with a lesser emphasis on technical aspects. I know a few licensed Amateurs that have never keyed up a radio! They passed the theory but the operation is too abstract for them to do, as they fear the wrath of the Code Nazi mentality if they dare transmit. Technology is good and interesting but operation must be taught as well. I know that many classes do NOT spend enough time on this topic nor does the training manual. One must purchase a second book as we are all aware of the “Operating Manual” from the RAC bookstore.
Recommendation 11 - New syllabus be divided into several elements and pass mark be required on every element.

I disagree

The syllabus and question banks should be updated and be improved. I have found a few mistakes in the question bank and have sent in my findings to RAC. Every year however the same questions are still there with the incorrect answers causing me to take very close look at many exams. Question banks can be expanded and the negative type questions should be eliminated. However, I think the current syllabus and question banks are reasonably good for examinations. I don't think it is necessary to break up the examination into separate parts with their own pass marks. A wheel is round no matter how you make it roll and the theory for radio is the same and does not change, therefore the questions in the bank are relevant.

Recommendation 14 – Pass marks on all elements be set at 75%

I disagree

I am not aware of any evidence that candidates passing with a lower grade (eg. 60-74) are a problem for the amateur radio service. Higher pass marks are not necessary.

One thing that was not mentioned in the recommendation is, that I believe that the band structure should stay relatively the same to allow those who are coders, to not have their bandwidth disturbed. Those who wish to practice code may do so without the fear of voice invading their portion of the bands. As I stated before, a good instructor can teach the new student where voice operation is allowed and getting a higher mark on an examination cannot determine if this practice will be adhered to? Only the good sense of an operator can.

I hope my comments will assist the powers that be to come up with a common useful means of delegating examinations to potential newcomers to the hobby and not drive them away with adeptly multi-tiered notions of elitism. We must welcome the next generations of Amateurs with open arms.

Thank you for reading my letter and sincerely yours;

Tom Domonkos

#46 - Alan Davidson

Re:Gazette Notice DGRB-003-04

Comments re No-Code Proposal for Amateur Radio in Canada

I am a licensed radio amateur in Canada, licensed in 1961

As a School Teacher and Scout leader, I have had many youth look at the possibility of obtaining their Amateur Radio License, and a few have done so over the years.

The biggest stumbling block in "selling" the idea of getting their license has been the requirement to learn international "Morse" code.

I feel that we should follow the lead of many other international jurisdictions, and just drop the code requirement with no other change to the regulations.
The proposal by Radio Amateurs of Canada (of which I am a member) is unnecessarily complicated, and adds another unnecessary level of bureaucracy.

If the present technical exams are not adequate to ensure operators know enough to not interfere with each other and with other radio services, then the question bank should be upgraded to include the required knowledge with no change in the passing mark requirements. I personally think the present level of knowledge required is adequate.

Alan Davidson
Sponsor of youth Amateur Radio Club licenses VE6LBP, VE6ANX, VE6JAM, VA6JAM

Alan Davidson
Calgary, Alberta

#47 - Bob Paxton

To whom it may concern:

1. I have no particular opinion one way or the other on Morse Code requirements although I intend to become proficient in CW operation for on-air use.

I think that on-air experience should strongly count towards attaining further operating privileges. Perhaps after 6-12 months, a Basic License holder could operate on the FM segment (29.5 - 29.7 MHZ) of the 10-Meter Band with a 100 Watt power limit. After a further 12 months, more HF privileges could be applied for.

However, any amateur could at any time upgrade their qualifications by taking the appropriate CW, upgraded Basic, or Advanced examinations, the latter would still be required for privileges currently associated with it.

Thank you for your consideration.

Bob Paxton
Recommendation 1
Radio Amateurs of Canada recommends to Industry Canada that the current Morse code Qualification be dropped as a requirement for operation in the bands below 30 MHz.

I support the intent of this recommendation. However since I do not agree with many of the subsequent recommendations which attempt to replace the Morse Code Qualification with more rigorous pass marks in the Basic Exam, I would suggest that the Morse Code Qualification be retained as ONE possible way of gaining operating privileges below 30 MHz.

Recommendation 2
RAC recommends to Industry Canada that, at the same time as Recommendation 1 comes into force, the achievement of a grade of at least 80% on the Basic examination will be required in order to be permitted to operate in the bands below 30 MHz. Achievement of at least 80% will lead to a new qualification to be called the Intermediate Qualification. Holders of the present Basic plus Morse Qualification will be deemed to hold the Intermediate Qualification.

I partially support this recommendation. However, I do not support removing the Basic plus Morse Qualification.

I do not see why it is necessary to replace the Basic with Morse Qualification with the Intermediate Qualification. Some people have the required aptitude for Morse Code, others an aptitude for written exams. While I support opening up the bands below 30 MHz to more users, I am not aware that the existing system has created any significant problems or abuse of the frequencies. Therefore I support continuing the existing Basic plus Morse Qualification in parallel with the new Intermediate Qualification – allowing both operating privileges below 30 MHz. I would propose the following amended recommendation:

At the same time as Recommendation 1 comes into force, the achievement of a grade of at least 80% on the Basic examination will lead to a new qualification to be called the Intermediate Qualification. Holders of the present Basic plus Morse Qualification or the new Intermediate Qualification will be permitted to operate in the bands below 30 MHz.

Recommendation 3
RAC recommends to Industry Canada that current holders of the Basic Qualification who have not also obtained the Morse Qualification should continue to have their existing operating privileges. That is, they will be permitted only to operate on the bands above 30 MHz.

I support this recommendation.

Recommendation 4
RAC recommends to Industry Canada that any current holder of the Basic Qualification who does not also have the Morse Qualification should have the option of re-taking the Basic examination with a view to obtaining a grade of at least 80%. Those who are successful will receive the Intermediate Qualification.

I do not support this recommendation.
As already explained, I feel that (at least during the “transition period” to a new syllabus) the Basic (60%) plus Morse Code Qualification (5 wpm) should continue to be an option for those wishing operating privileges below 30 MHz. I would propose the following amended recommendation:

*Any current holder of the Basic Qualification who does not also have the Morse Qualification should have the option of re-taking the Basic examination with a view to obtaining a grade of at least 80%, or the option of taking the Morse Code Qualification. Those who are successful in obtaining 80% in the Basic Qualification will receive the Intermediate Qualification. Those who are successful in passing the Morse Code Qualification will receive Basic plus Morse Qualification as at present.*

**Recommendation 5**

RAC recommends to Industry Canada that the pass mark for the examination leading to the Basic Qualification be raised to 70% at the same time as the Morse code requirement is eliminated.

I do not support this recommendation.

I do not understand why RAC wishes to make it more difficult to become an Amateur operator in Canada. I do not see any current problems and wish to see as many people as possible given the opportunity to become radio amateurs. I see no reason to change the Basic Qualification prior to the introduction (if any) of a new syllabus.

**Recommendation 6**

RAC recommends to Industry Canada that all persons who currently hold both the Basic and Advanced Qualifications be given operating privileges on the HF bands. In future, persons who wish to obtain the Advanced Qualification should already hold the Intermediate Qualification, or the current Basic plus Morse Qualifications, and will need to obtain a grade of at least 70% on the Advanced examination.

There are actually three separate recommendations here:

a) “all persons who currently hold both the Basic and Advanced Qualifications be given operating privileges on the HF bands.”

I support this part of the recommendation.

b) “In future, persons who wish to obtain the Advanced Qualification should already hold the Intermediate Qualification, or the current Basic plus Morse Qualifications”

I do not support this part of the recommendation. I feel the existing system of allowing any holder of the Basic Qualification to take the Advanced exam is correct. There are those who wish to have the privileges of building transmitting equipment or setting up club stations but who have no interest in operation below 30 MHz.

c) “and will need to obtain a grade of at least 70% on the Advanced examination.”

I do not support this part of the recommendation. I feel pass marks are adequate. As discussed later, any review of pass marks should be part of a future introduction of new syllabi (if any).

I would propose the following amended recommendation:

*All persons who currently hold both the Basic and Advanced Qualifications be given operating privileges on the HF bands.*
Recommendation 7
RAC recommends to Industry Canada that the present Morse code examination continue to be available to those Canadian radio amateurs who wish to have that qualification specified on their certificate.

I partially support this recommendation. However, I do not support removing the Basic plus Morse Qualification. I would propose the following amended recommendation:

*The present Morse code examination continue to be available to those Canadian radio amateurs who wish to have that qualification specified on their certificate and that the Basic plus Morse Qualification continue to be valid, allowing operation below 30 MHz.*

Recommendation 8
RAC recommends to Industry Canada that holders of the Intermediate Qualification be permitted to construct and use commercial transmitting equipment kits.

I support this recommendation.

Recommendation 9
RAC recommends to Industry Canada that holders of the Intermediate Qualification be permitted to construct and use their own transmitting equipment in the bands at 2.3 GHz and above.

I do not support this recommendation.

Someone wishing to design/build their own transmitters (not from a kit) should demonstrate their technical abilities by passing the Advanced Qualification.

Recommendation 10
RAC recommends that a new entry-level qualification be introduced, designed to ensure good operating practices and requiring only an introductory level of theory.

I support this recommendation.

I support this as part of a thorough review of syllabi and examinations.

Recommendation 11
RAC recommends that all examinations on the new syllabus be divided into several elements, as appropriate, and a pass mark be required on every element.

I do not support this recommendation.

Any review of examination structure should take place as part of the introduction of new syllabi and exams.

Recommendation 12
RAC recommends to Industry Canada that the pass mark on all elements of all examinations be set at 75 percent at the same time as the new syllabi are introduced.

I do not support this recommendation.

Any review of the pass marks should take place as part of the introduction of new syllabi.
Summary Of Comments

I support the removal of Morse Code as the only way of obtaining operating privileges below 30 MHz. However, I do not support replacing the Morse Code qualification with the new Intermediate Qualification requiring an 80% pass on the Basic examination.

At least during the transition period to new syllabi, I would propose that both the present Basic plus Morse and the new Intermediate qualifications should coexist and that Amateurs should be free to take either qualification to allow them to operate below 30 MHz.

I support allowing all Advanced Qualification holders the ability to operate below 30 MHz.

I do not support any changes to examination pass marks or changes to who can sit the Advanced Qualification examinations until a full review along with proposed new syllabi.

Finally, I support allowing Intermediate Qualification holders to build transmitting kits but I do not support allowing them to build (non-kit) transmitters above 2.3 GHz.

My proposals would give four levels of Qualification:

<table>
<thead>
<tr>
<th>Qualification</th>
<th>Basic</th>
<th>Basic plus Morse</th>
<th>Intermediate</th>
<th>Advanced</th>
</tr>
</thead>
<tbody>
<tr>
<td>Privileges</td>
<td>Operation above 30MHz</td>
<td>Operation on all bands</td>
<td>Operation on all bands</td>
<td>Operation on all bands</td>
</tr>
<tr>
<td>Requirement</td>
<td>Basic exam (60%)</td>
<td>Basic exam (60%) plus Morse Code (5 wpm)</td>
<td>Basic exam with 80%</td>
<td>Prerequisite Basic or Intermediate</td>
</tr>
<tr>
<td>Certificate</td>
<td>&quot;Basic&quot;</td>
<td>&quot;Basic&quot; + &quot;Morse Code&quot;</td>
<td>&quot;Intermediate&quot; *</td>
<td>&quot;Advanced&quot; *</td>
</tr>
</tbody>
</table>

* Intermediate or Advanced certificate holder may be endorsed with the Morse notation if Morse Qualification has been passed.

Comments submitted by:

Nick Massey, VA7NRM
#49 - Alena Gachova
I am a Basic Qualification amateur currently studying for my Morse Code Qualification. I strongly support encouraging more people to become Amateur operators and relaxing the rules for operation below 30 MHz.

I feel that not everyone has the technical background to pass the Basic examination with 80% and that it should not be necessary to be a “radio technician” in order to enjoy operating below 30 MHz. If the exam pass mark is going to be set at 80% for HF operation then the option of taking the Morse Code Qualification should remain open for those whose aptitude is more towards Morse code than technical exams.

I would support allowing either the present Basic Qualification plus Morse Code or the new Intermediate qualification as requirements for operation below 30 MHz. This would allow people to choose the route more suited to their own skills.

I have not seen any problems caused by the existing examination system and I do not support any changes to examination pass marks. I think we should be encouraging more people to become Amateurs – not making it more difficult.

Comments submitted by:

Alena Gachova, VA7AGA
Comments – Gazette Notice DGRB-003-04

Note: I have paraphrased RAC’s list of recommendations. I have been an active Amateur Radio Operator since 1994.

Recommendation 1 – Eliminate the Morse-code Qualification

I am in full agreement.

Knowledge of morse-code should no longer be used as a pre-requisite for access to HF. I am very active on some of the HF bands and during the last decade I have noticed a massive decline in Canadian HF activity. I would like to see this trend reversed and giving access to this part of the spectrum to all amateurs will probably help to slow down the declining rate of HF use.

Recommendation 2 – Higher pass marks & a new Intermediate Qualification

I disagree.

Creating another qualification designed to keep amateurs from using HF spectrum is not necessary. New amateurs who choose to use HF will adapt to this radio environment rapidly. There may be some learn as you go, but that is where the more experienced amateurs can help by example and by offering assistance.

I fail to see how eliminating the morse-code qualification changes the likelihood and impact of adverse effects to amateurs currently using HF. There have been cases of improper and inappropriate operations on HF but I think you will find that for the most part this has had to do more with the character of the persons involved than with how high of a pass mark those persons had obtained.

Dual passing marks for writing the same examination creates an “I am smarter than you” environment. Now everyone passing is treated equally and the marks are not disclosed. The new proposal would create two kinds of amateurs. Those with low marks and those with high marks. The low markers get Basic and the high markers would get Intermediate with the whole world being told on a web site. This is not appropriate.

Recommendation 3 – Prohibit operators with only Basic Qualification from using HF

I disagree.

We need more amateurs, especially those with an interest in emergency preparedness and trained in the use of HF. Maintaining unnecessary roadblocks to amateurs for accessing HF radio spectrum is not and has not been justified in the proposal.

Recommendation 4 – Re-examine Basic Qualification holders with a view to obtaining 80% for obtaining an Intermediate Qualification

I disagree

Passing the examination should be the only evidence required for demonstrating interest in the hobby and the basic knowledge for using amateur radio equipment in any and all amateur radio bands.

Recommendation 5 - Increase pass marks for the Basic Qualification to 70%
I disagree.

It has not been demonstrated that entry to our hobby needs to be more difficult. We need new entrants and those sincerely interested will learn as they go.

Recommendation 6 – Existing Basic & Advanced qualification holders be allowed to use HF. Future Advanced candidates need to obtain 70% pass mark and pre-requisite of new Intermediate qualification or Basic with Morse Code.

    I disagree

All amateurs with the Basic qualification should be given access to HF spectrum. Additional roadblocks to access HF spectrum is unnecessary.

Recommendation 7 – Continue Morse-code examinations for those who wish to have the qualification.

    I disagree

When the morse-code qualification is removed from regulations, this ability does not need to be tested by the regulator. The role for recognizing morse-code ability should be with Amateur organizations.

Recommendation 8 – Intermediate Qualification holders may construct and use commercial transmitting equipment kits

    I disagree

I recommend that all Basic Qualification holders be allowed to construct and use commercial transmitting equipment kits.

Recommendation 9 – Intermediate Qualification holders be permitted to construct and use their own equipment at 2.3 GHz and above

    I disagree

I disagree with the concept of adding the proposed Intermediate Qualification.

Recommendation 10 – New entry level qualification be introduced.

    I somewhat agree

If a new entry level qualification should be introduced, suggest that power and antenna restrictions be used to encourage new entrants to progress to Basic and Advanced.

Alternatively, perhaps the syllabus and question bank for the Basic Qualification be changed so that the examination concentrates more on regulations, operating procedures and safety issues with a lesser emphasis on technical aspects.

Recommendation 11 - New syllabus be divided into several elements and pass mark be required on every element.

    I disagree

The syllabus and question banks should be updated and be improved. Question banks can be expanded
and the negative type questions should be eliminated. However, I think the current syllabus and question banks are reasonably good for examinations. I don’t think it is necessary to break up the examination into separate parts with their own pass marks.

Recommendation 14 – Pass marks on all elements be set at 75%

I disagree

I am not aware of any evidence that candidates passing with a lower grade (eg. 60-74) are a problem for the amateur radio service. Higher pass marks are not necessary.

#51 - Spike
Hello:

1. Thank you for the opportunity to respond to information provided about the morse code requirement for amateur radio. I have been an amateur radio operator since 1978. I used to be WB7 WBE. In the early 90's, I was allowed to transfer my license to Canada, and I am grateful that opportunity was offered.

I have never found a need to communicate in morse code. I feel it is a useful method of communication for some uses, and a lot of fun for many people. However, I believe the requirement to be proficient in its use is not needed. I do not feel there would be a flood of "undesireables" to the ham bands if morse code was eliminated as a requirement for licensure. In fact, we could use more peple, especially young people, on all of the ham bands. Young people are more likely to use the information transfer methods facilitated by a computer than those of us who are now quickly becoming oldtimers.

In short, I believe there needs to remain in place a testing process that tests radio theory and communication practice, but morse code is just not all that relevant.

Good luck in your attempts to make ham radio more accessible and somehow not alienate the "real hams" whose stomachs this opinion will surely turn.

Best wishes,

Mike Christensen

#52 - Phillip Grimison
October 14, 2004

Director General
Radiocommunications and Broadcasting Regulatory Branch,
Industry Canada,
300 Slater Street,
Ottawa.
Ontario.
K1A 0C8

Dear Sir,

Re: COMMENTS – Gazette Notice DGRB-003-04

Canada Gazette, Part I – Consultation on “Recommendations from Radio Amateurs of Canada to Industry Canada Concerning Morse Code and Related Matters”

RAC is recommending that those amateurs who previously passed the Basic qualification, but only when coupled with the Five Word per Minute Morse code requirement, be granted operating privileges below 30 Megahertz.

This goes against the decision made by the ITU to remove from the International Radio Regulations the mandatory requirement for proficiency in Morse code as a qualification for operation below 30 Megahertz.

There are many amateurs in a similar position to myself in that, whilst having a pass mark greater than 80% (my own pass mark was 90%), are to be penalized and not allowed to operate below 30 Mhz. even while the recommendation is that new, 80% pass amateurs be given those very same privileges that we are to be denied.

It is my recommendation that “grandfathering” of existing Basic license holders to the new RAC recommended Intermediate license be implemented.
The principle of “grandfathering” in the amateur service is not new and was implemented by the Industry Canada predecessor; the DOC (Department of Communications); in the amateur restructuring effective October 1st, 1990.

Yours faithfully,

Phillip Anthony Grimison
VE7PAG
I have read the proposal from RAC and although I am not a member of that organisation I fully support the regulation changes outlined within.

Sincerely
Philip B Carless

1. LIST OF RECOMMENDATIONS (taken from the RAC Document)

Recommendation 1
Radio Amateurs of Canada recommends to Industry Canada that the current Morse code Qualification be dropped as a requirement for operation in the bands below 30 MHz.

My answer: This is the objective of the exercise.

Recommendation 2
RAC recommends to Industry Canada that, at the same time as Recommendation 1 comes into force, the achievement of a grade of at least 80% on the Basic examination will be required in order to be permitted to operate in the bands below 30 MHz. Achievement of at least 80% will lead to a new qualification to be called the Intermediate Qualification. Holders of the present Basic plus Morse Qualification will be deemed to hold the Intermediate Qualification.

My answer: This would be an effective method for the future applicants.

Recommendation 3
RAC recommends to Industry Canada that current holders of the Basic Qualification who have not obtained the Morse Qualification should continue to have their existing operating privileges. That is, they will be permitted only to operate on the bands above 30 mhz.

My answer: This is in opposition of Recommendation 1. I believe they should have the grandfather clause applied.

Recommendation 4
RAC recommends to Industry Canada that any current holder of the Basic Qualification who does not also have the Morse Qualification should have the option of re-taking the Basic examination with a view to obtaining a grade of at least 80%. Those who are successful will receive the Intermediate Qualification.

My answer: This is discrimination, Recommendation 5 has 70%, After all many Amateurs have been operating for many years., and have a good knowledge of the rules.

Recommendation 5
RAC recommends to Industry Canada that the pass mark for the examination leading to the Basic Qualification be raised to 70% at the same time as the Morse code requirement is eliminated.

My answer: This may be a good idea, if there was some merit to it.

Recommendation 6
RAC recommends to Industry Canada that all persons who currently hold both the Basic and Advanced Qualifications be given operating privileges on the HF bands. In future, persons who wish to obtain the Advanced Qualification should already hold the Intermediate Qualification, or the current Basic plus Morse Qualifications, and will need to obtain a grade of at least 70% on the Advanced examination.

My answer: Very confusing.
Recommendation 7
RAC recommends to Industry Canada that the present Morse code examination continue to be available to those Canadian radio amateurs who wish to have that qualification specified on their certificate.

My answer: Yes, this is a good decision for those who wish to use the outmoded transmission methods.

Recommendation 8
RAC recommends to Industry Canada that holders of the Intermediate Qualification be permitted to construct and use commercial transmitting equipment kits.

My answer: No comment.

Recommendation 9
RAC recommends to Industry Canada that holders of the Intermediate Qualification be permitted to construct and use their own transmitting equipment in the bands at 2.3 GHz and above.

My answer: No comment.

Recommendation 10
RAC recommends that a new entry-level qualification be introduced, designed to ensure good operating practices and requiring only an introductory level of theory.

My answer: There is no bands mentioned here, or are they allowed to operate any frequency???

Recommendation 11
RAC recommends that all examinations on the new syllabus be divided into several elements, as appropriate, and a pass mark be required on every element.

My answer: This would be a very good method.

Recommendation 12
RAC recommends to Industry Canada that the pass mark on all elements of all examinations be set at 75 percent at the same time as the new syllabi are introduced.

My answer: What happened to the 70% mentioned in Recommendation 5.

Conclusion:
I find that after reading all the items that have been posted on the RAC website, that the original objective of removing the morse code requirement for bands below 30mhz, has been lost in the Analysis.

I have read the items submitted to the RAC Group and NOWHERE, does it suggest that those with the present Basic Qualification should have to redo the Examination and get a 80% in order to access the HF bands. I feel that RAC has changed the wishes of the Amateur community to their own ideas.

In fact, there have been many suggestions that by opening up the HF bands, that RAC could expect more members and therefore more support for their many future recommendations to Industry Canada.

I have been in Amateur Radio for the past 10 years and have not used the outdated Morse Code, but, I have progressed to the newer methods for data transmission like APRS and yes, Packet(this is having a revival). I find that there is a definite trend for the newer methods, because of the introduction of the computer.

Therefore, because the RAC Group has failed in the completion of the objective as listed in Recommendation 1, that Industry Canada NOT agree with the any of the other recommendations as outlined in the Gazette, and, drop the requirement for morse code completely.

Included below is a direct quote from the Gazette stating that 66% recommended deletion of the Morse Code, so that defeats the RAC Group in trying to keep the morse code as a requirement.
Ed Holmes

12 Oct 2004

A quote From the Gazette
In July and August 2003, to form a basis for a recommendation to Industry Canada, RAC conducted a survey via the Internet of Canadian radio amateurs to ascertain their wishes concerning the deletion or retention of the Morse code qualification. More than 1400 valid responses, a statistically significant sample of the approximately 51,500 Canadian amateur community, were received. Of the respondents, 66 percent recommended deletion of the mandatory Morse code requirement. At the same time, RAC Directors conducted surveys of their constituents, and these results also were taken into account in preparing their proposal. In addition to recommending the deletion of the Morse code requirement, the proponents also recommended other changes, such as increasing the pass mark for the Basic qualification. Many of the recommendations are included as related matters in the proposal.

------------------------------------------------------------------------
#55 -Harry Eldon

Comments – Gazette Notice DGRB-003-04
Note: I have paraphrased RAC’s list of recommendations. I have been an active Amateur Radio Operator since 1998.

Recommendation 1 – Eliminate the Morse-code Qualification
I am in full agreement.

Knowledge of morse-code should no longer be used as a pre-requisite for access to HF. I am very active on some of the HF bands and during the last decade I have noticed a massive decline in Canadian HF activity. I would like to see this trend reversed and giving access to this part of the spectrum to all amateurs will probably help to slow down the declining rate of HF use.

Recommendation 2 – Higher pass marks & a new Intermediate Qualification
I disagree.

Creating another qualification designed to keep amateurs from using HF spectrum is not necessary. New amateurs who choose to use HF will adapt to this radio environment rapidly. There may be some learn as you go, but that is where the more experienced amateurs can help by example and by offering assistance.

I fail to see how eliminating the morse-code qualification changes the likelihood and impact of adverse effects to amateurs currently using HF. There have been cases of improper and inappropriate operations on HF but I think you will find that for the most part this has had to do more with the character of the persons involved than with how high of a pass mark those persons had obtained.

Dual passing marks for writing the same examination creates an “I am smarter than you” environment. Now everyone passing is treated equally and the marks are not disclosed. The new proposal would create two kinds of amateurs. Those with low marks and those with high marks. The low markers get Basic and the high markers would get Intermediate with the whole world being told on a web site. This is not appropriate.

Recommendation 3 – Prohibit operators with only Basic Qualification from using HF
I disagree.

We need more amateurs, especially those with an interest in emergency preparedness and trained in the use of HF. Maintaining unnecessary roadblocks to amateurs for accessing HF radio spectrum is not and has not been justified in the proposal.

**Recommendation 4 – Re-examine Basic Qualification holders with a view to obtaining 80% for obtaining an Intermediate Qualification**

I disagree

Passing the examination should be the only evidence required for demonstrating interest in the hobby and the basic knowledge for using amateur radio equipment in any and all amateur radio bands.

**Recommendation 5 - Increase pass marks for the Basic Qualification to 70%**

I disagree.

It has not been demonstrated that entry to our hobby needs to be more difficult. We need new entrants and those sincerely interested will learn as they go.

**Recommendation 6 – Existing Basic & Advanced qualification holders be allowed to use HF. Future Advanced candidates need to obtain 70% pass mark and pre-requisite of new Intermediate qualification or Basic with Morse Code.**

I disagree

All amateurs with the Basic qualification should be given access to HF spectrum. Additional roadblocks to access HF spectrum is unnecessary.

**Recommendation 7 – Continue Morse-code examinations for those who wish to have the qualification.**

I disagree

When the morse-code qualification is removed from regulations, this ability does not need to be tested by the regulator. The role for recognizing morse-code ability should be with Amateur organizations.

**Recommendation 8 – Intermediate Qualification holders may construct and use commercial transmitting equipment kits**

I disagree

I recommend that all Basic Qualification holders be allowed to construct and use commercial transmitting equipment kits.

**Recommendation 9 – Intermediate Qualification holders be permitted to construct and use their own equipment at 2.3 GHz and above**

I disagree

I disagree with the concept of adding the proposed Intermediate Qualification.

**Recommendation 10 – New entry level qualification be introduced.**

I somewhat agree

If a new entry level qualification should be introduced, suggest that power and antenna restrictions be used to encourage new entrants to progress to Basic and Advanced.
Alternatively, perhaps the syllabus and question bank for the Basic Qualification be changed so that the examination concentrates more on regulations, operating procedures and safety issues with a lesser emphasis on technical aspects.

**Recommendation 11 - New syllabus be divided into several elements and pass mark be required on every element.**

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The syllabus and question banks should be updated and be improved. Question banks can be expanded and the negative type questions should be eliminated. However, I think the current syllabus and question banks are reasonably good for examinations. I don’t think it is necessary to break up the examination into separate parts with their own pass marks.

**Recommendation 14 – Pass marks on all elements be set at 75%**

I disagree

I am not aware of any evidence that candidates passing with a lower grade (eg. 60-74) are a problem for the amateur radio service. Higher pass marks are not necessary.

Sincerely,

Harry K. Eldon

#56 - Bruce Stewart

Dear Sir or Madam

My name is Bruce Stewart, VE6ATY, and I reside in Lethbridge, AB.

I am sending you this correspondence from Frank VanderZande, VE7AV, as I am in complete agreement with his comments.

Yours sincerely

Bruce Stewart

October 15, 2004

**Comments - Gazette Notice DGRB-003-04**

Note: I have paraphrased RAC's list of recommendations. I have been an active Amateur Radio Operator since 1962.

**Recommendation 1 - Eliminate the Morse-code Qualification**

I am in full agreement.

Knowledge of morse-code should no longer be used as a pre-requisite for access to HF. I am very active on some of the HF bands and during the last decade I have noticed a massive decline in Canadian HF activity. I would like to see this trend reversed and giving access to this part of the spectrum to all amateurs will probably help to slow down the declining rate of HF use.
Recommendation 2 - Higher pass marks & a new Intermediate Qualification

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Creating another qualification designed to keep amateurs from using HF spectrum is not necessary. New amateurs who choose to use HF will adapt to this radio environment rapidly. There may be some learn as you go, but that is where the more experienced amateurs can help by example and by offering assistance.

I fail to see how eliminating the morse-code qualification changes the likelihood and impact of adverse effects to amateurs currently using HF. There have been cases of improper and inappropriate operations on HF but I think you will find that for the most part this has had to do more with the character of the persons involved than with how high of a pass mark those persons had obtained.

Dual passing marks for writing the same examination creates an "I am smarter than you" environment. Now everyone passing is treated equally and the marks are not disclosed. The new proposal would create two kinds of amateurs. Those with low marks and those with high marks. The low markers get Basic and the high markers would get Intermediate with the whole world being told on a web site. This is not appropriate.

Recommendation 3 - Prohibit operators with only Basic Qualification from using HF

I disagree.

We need more amateurs, especially those with an interest in emergency preparedness and trained in the use of HF. Maintaining unnecessary roadblocks to amateurs for accessing HF radio spectrum is not and has not been justified in the proposal.

Recommendation 4 - Re-examine Basic Qualification holders with a view to obtaining 80% for obtaining an Intermediate Qualification

I disagree

Passing the examination should be the only evidence required for demonstrating interest in the hobby and the basic knowledge for using amateur radio equipment in any and all amateur radio bands.

Recommendation 5 - Increase pass marks for the Basic Qualification to 70%

I disagree.

It has not been demonstrated that entry to our hobby needs to be more difficult. We need new entrants and those sincerely interested will learn as they go.

Recommendation 6 - Existing Basic & Advanced qualification holders be allowed to use HF. Future Advanced candidates need to obtain 70% pass mark and pre-requisite of new Intermediate qualification or Basic with Morse Code.

I disagree

All amateurs with the Basic qualification should be given access to HF spectrum. Additional roadblocks to access HF spectrum is unnecessary.

Recommendation 7 - Continue Morse-code examinations for those who wish to have the qualification.

I disagree
When the morse-code qualification is removed from regulations, this ability does not need to be tested by the regulator. The role for recognizing morse-code ability should be with Amateur organizations.

**Recommendation 8 - Intermediate Qualification holders may construct and use commercial transmitting equipment kits**

I disagree

I recommend that all Basic Qualification holders be allowed to construct and use commercial transmitting equipment kits.

**Recommendation 9 - Intermediate Qualification holders be permitted to construct and use their own equipment at 2.3 GHz and above**

I disagree

I disagree with the concept of adding the proposed Intermediate Qualification.

**Recommendation 10 - New entry level qualification be introduced.**

I somewhat agree

If a new entry level qualification should be introduced, suggest that power and antenna restrictions be used to encourage new entrants to progress to Basic and Advanced.

Alternatively, perhaps the syllabus and question bank for the Basic Qualification be changed so that the examination concentrates more on regulations, operating procedures and safety issues with a lesser emphasis on technical aspects.

**Recommendation 11 - New syllabus be divided into several elements and pass mark be required on every element.**

I disagree

The syllabus and question banks should be updated and be improved. Question banks can be expanded and the negative type questions should be eliminated. However, I think the current syllabus and question banks are reasonably good for examinations. I don't think it is necessary to break up the examination into separate parts with their own pass marks.

**Recommendation 14 - Pass marks on all elements be set at 75%**

I disagree

I am not aware of any evidence that candidates passing with a lower grade (eg. 60-74) are a problem for the amateur radio service. Higher pass marks are not necessary.

Sincerely,

Frank VanderZande

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#57 - William Till
Comments – Gazette Notice DGRB-003-04

I will comment on the RAC list of recommendations as they are presented in the RAC document. I have been an active radio amateur since 1956 and have held an Advanced licence since 1958. I have been active with our local Sask Alta Radio Club since its founding in 1975 and I have held office in such groups as the Amateur Radio League of Alberta and Radio Amateurs of Canada. I have been an Accredited Examiner since about 1993 and have been directly responsible for the licencing of over fifty new amateur operators. In forming an opinion for this presentation of comments, I have canvassed the members of the local club and have discussed the RAC proposal with them and other licenced amateurs of my acquaintance. They all support my stances stated herein.

Recommendation 1 – Elimination of the Morse-code Qualification

I agree totally.

Knowledge of Morse code should no longer be used as a pre-requisite for access to HF. I am active on most of the HF bands and I am distressed at the decline of Canadian activity on the HF bands. This trend must be reversed and the best way to do it is to give access to the HF spectrum to all licenced Canadian amateurs.

The Morse code requirement is obsolete and is no longer required in a growing number of countries. Canada should join them and amend our regulations to drop any Morse requirement.

Recommendation 2 – Higher pass marks & a new Intermediate Qualification

I strongly disagree.

It is not necessary to create another level of qualification solely to grant HF operating privileges. It would unduly complicate the licencing process for the regulators and for the amateur population. The point is made that a higher level of competence and adherence to the rules, regulations and operating practices is necessary for operation on the HF bands because of the long distance and international communication capabilities of HF. I have a simple and traditional proposal to offer to deal with that concern.

Years ago, before the overhaul and realignment of the regulation and examination process for licencing of Canadian amateur radio operators, there were two classes of licence, Amateur and Advanced Amateur. The Amateur licence required ten words per minute of Morse code and gave HF privileges using code only, but after six months of active operation, verified by log book inspection, the Amateur licence holder could request permission to operate on the 28 mHz band using voice modulation modes. The assumption was that the newly licenced amateur would have gained experience and learned acceptable operating practices from contact with existing licencees.

Operation in the HF bands needs encouragement so it would be logical to allow access to...
least one or two HF bands with the initial Basic licence. A suggestion would be to include the 3.5 – 4 mHz and 28 – 29.7 mHz bands in addition to the bands above 30 mHz as at present with the existing Basic restrictions for power levels and equipment. Then after a period of time, say six months or one year of active operation including at least some operation on those HF bands, the licencee could apply to an Accredited Examiner for HF privileges on all standard HF bands. Verification of activity would be by inspection of logbooks, QSL cards or personal knowledge by the Accredited Examiner who would fill out and send in the usual form for the change in licence privileges and approval by the regulator.

This would require minimal changes in the paperwork now used and would be equivalent to the present Basic plus Morse code qualification for access to all HF bands. The one year probational period would give the applicant experience and guidance from active amateurs who would provide advice and mentoring.

As for the RAC proposal that there be two minimum marking levels used to qualify candidates for their proposed “Basic” or “Intermediate” licences, I find it most inappropriate. Two kinds of amateurs would be created, those with high marks and those with lower marks, the results to be posted for public access on the Internet. The present system treats everyone equally without disclosure of marks and is to be preferred.

Recommendation 3 – Prohibit operators with only Basic Qualification without Morse code from using HF

I disagree.

Present holders of Basic qualification should be granted HF privileges if all Morse code requirements are removed. These amateurs have already gained enough experience and knowledge to operate competently on HF as evidenced by their possession of their Basic licence. The demonstration of Morse capability formerly required for HF access has no bearing on knowledge of regulations or operating practices.

We need more amateurs, especially those with an interest in emergency preparedness and trained and equipped in the use of HF. I have been associated with Emergency Preparedness for many years and have worked with our city officials and other local groups to help provide an emergency communications capability in this area. The City of Lloydminster disaster plan includes amateur radio as a primary communications service provider for some functions and as a backup for all other communications services. This means that many new amateur radio operators need to be encouraged, recruited, trained and equipped in order to fulfill our role in disaster communications. HF capability is an essential part of the disaster plan.

Recommendation 4 – Re-examine Basic Qualification holders with a view to obtaining 80% for obtaining an Intermediate Qualification

I disagree
The proposed Intermediate licence class is not necessary and would unduly complicate the administration of amateur radio by the regulators.

Recommendation 5 - Increase pass marks for the Basic Qualification to 70%

I disagree.

There is no need to make entry level licencing into amateur radio more difficult. We need more new entrants to increase our ranks to help with emergency communications and to encourage those with an interest in electronics and radio to experiment and explore new facets of wireless communication. Those who are interested will learn through their own experiences and their interaction with existing amateurs.

Increasing the pass mark level will tend to intimidate and turn away potential applicants who could pass at the present required mark levels and would be excellent operators with some on-air experience and mentoring.

Recommendation 6 – Existing Basic & Advanced qualification holders be allowed to use HF. Future Advanced candidates need to obtain 70% pass mark and pre-requisite of new Intermediate qualification or Basic with Morse Code.

I agree that all existing licencees should be granted HF operating privileges. I disagree that it is necessary to increase the pass mark level for future candidates.

All amateurs with the Basic qualification should be given access to HF spectrum. If it is deemed expedient to require some experience before granting full HF privileges, the one year of operating experience I have proposed above could be required.

Additional roadblocks to access the HF spectrum are unnecessary.

Recommendation 7 – Continue Morse-code examinations for those who wish to have the qualification.

I disagree

When the existing Morse code requirement is removed, no further testing in Morse need be provided by the regulator. Tangible recognition of various levels of Morse code capability can be provided by existing amateur radio organizations such as RAC or ARRL.

If the lack of an official recognition of Morse code capability by Canadian amateurs results in a non negotiable loss of reciprocity with other countries with whom agreements are now in place, Industry Canada official certification may have to be retained for those who desire it, otherwise it
should be discontinued.

Recommendation 8 – Intermediate Qualification holders may construct and use commercial transmitting equipment kits

I disagree

I recommend that all Basic Qualification holders be allowed to construct and use commercial transmitting equipment kits. The sooner a new amateur can gain hands-on experience, the better. A very large majority of new candidates get their licences through study classes conducted by amateur radio clubs and/or by being mentored by experienced amateurs, thus they have help at hand to guide them in assembling and testing kits.

Recommendation 9 – Intermediate Qualification holders be permitted to construct and use their own equipment at 2.3 GHz and above

I disagree

See above.

Recommendation 10 – New entry level qualification be introduced.

I disagree

The existing Basic Qualification covers the situation nicely with some possible adjustments and minor changes from time to time as technology changes and improvements are agreed upon.

Recommendation 11 - New syllabus be divided into several elements and pass mark be required on every element.

I disagree

The syllabus and question banks could be updated and improved at regular intervals. Question banks could be expanded and the negative type questions should be eliminated. The existing syllabus and question banks are reasonably good for examinations. It is not necessary to break up the examination process into separate elements with their own pass marks. Further complications are not necessary and would increase administration costs and complexity.
Recommendation 12 – Pass marks on all elements be set at 75%

I disagree

My own experience as an Accredited Examiner and long-time amateur operator has not made me aware of any problems caused by candidates who passed their exams with lower grades. I have had a few cases where the candidate was obviously guessing and in every case, the candidate failed. Higher passing marks are not necessary and would only serve to intimidate and discourage potential candidates for an amateur radio licence. I fear that raising the pass level would create an impression of elitism and exclusion among the general public.

Further remarks and observations

Years ago, when the now existing Basic and Advanced classes of amateur licence were created, there were dire predictions that amateur radio would somehow be contaminated, crowded and degraded by the entry of large numbers of "CBers". It did not happen.

I am quite convinced that amateur radio will not suffer from the entry of Basic amateurs to the HF bands in spite of the predictions of alarmists. It will not happen. On the contrary, they and all of amateur radio will benefit. Amateurs holding only a Basic Qualification can operate in any mode in the bands above 30 mHz which means that they can operate using many techniques that are far more sophisticated than ordinary HF operation such as: operation though satellites, fast scan TV, APRS, IRLP, Echolink, packet radio, meteor scatter propagation, weak signal DX operation, etc., etc. If passing the Basic examination qualifies amateurs to use any or all of these techniques and modes of operation, there is no reason why they should be excluded from HF operation after they have had a short period of active experience.

The ranks of existing amateur radio operators have a responsibility to ensure the continuing existence and expansion of their hobby by encouraging and mentoring anyone interested in electronics and amateur radio. Particular emphasis should be placed on the encouragement of young people to discover the challenges and interest of amateur radio. With all the competing interests, sports and hobbies available to young people, the last thing that is needed is to increase the difficulties of entry into amateur radio. Let us not raise the bar when there is not a demonstrated need or benefit.

If we are trying to promote ham radio and grow the ham population, raising the bar and appearing more elitist is not the way to do it. I think we should leave the Basic pass mark at 60% where it is now and concentrate on mentoring these candidates after they get their call signs.

We must face reality in today's regulatory environment, too. Industry Canada is obligated to keep costs and manpower requirements to a minimum. Any changes to amateur radio certification standards that result in increases in complication and cost are unlikely to be seriously considered. Amateur radio is considered to be largely self-regulating and to a great degree, through peer pressure and persuasion, self enforcing. Industry Canada officials need to be called in on only the most difficult cases. In order to keep this valuable tradition viable and practical, regulations should be uncomplicated and easily understood and enforced.
If we attempt to devise regulations that deal with all untoward possibilities, no matter how improbable, cost and manpower requirements could become totally impractical. If the administration of amateur radio regulation becomes overly burdensome to Industry Canada, we could lose spectrum to ever-hungry commercial interests.

The spectrum assigned to amateur radio must appear to be busy and occupied. Commercial communications corporations continually monitor the radio spectrum including the amateur bands and apply pressure to governmental regulators to give them access to unused spectrum. Simply put, if we don't use it, we will lose it. Thus, in order to encourage occupation of the HF bands assigned to us, it is in our best interests to give HF access to Basic licencees.

The important thing is to licence interested people at minimum acceptable standards and help them to expand their radio knowledge and experience from there. All amateurs learn a lot more after their initial licence than they knew before they wrote the exam.

Respectfully submitted,

William G. Till

#58 - Eric Mundle

Date: October 18, 2004

Please accept this document as comments towards Gazette Notice DGRB-003-04.

I have read the Radio Amateurs of Canada recommendations concerning Morse Code and Related Matters.

Since I received my license in approximately 1990 I have attempted to learn morse code on several occasions and I have not been successful. For some reason I am only able to learn about 16 to 18 characters and I cannot seem to learn any more. Because I can’t seem to break the 16 to 18 character barrier I have not been able to take the morse code tests so I can work the HF bands and pursue my hobby. I have pretty much given up learning morse code.

In the RAC Recommendations document on page 6, paragraph 5 the following is stated;

“Morse is a skill. It requires a certain aptitude. Not all individuals have this aptitude. Therefore to retain the Morse test discriminates unfairly against many people.”

I believe that because I have not been able to learn morse code is because I do not have the aptitude to learn it. Now that there is consideration for the removal of the morse code requirement, I may someday be able to get on the HF bands and pursue my hobby.
I would also like to offer an additional idea to recommendation 4. For people that have had their Basic qualifications only, for more than 10 years without a morse code endorsement on their license, that they be grandfathered in and be given the equivalent of an Intermediate license based on experience, allowing them to operate on all bands and positioning the individual to take the Advanced examination. Recommendation 4 would have the following sentence added to it:

“Furthermore, any current holder of the Basic Qualification only who has held that qualification for 10 years or more be given the equivalent to the Intermediate Qualification allowing them to use all amateur bands.”

Recommendation 4 would then read as follows:

“RAC recommends to Industry Canada that any current holder of the Basic Qualification who does not have the Morse Qualification should have the option of re-taking the Basic examination with a view to obtaining a grade of at least 80%. Those who are successful will receive the Intermediate Qualifications. Furthermore, any current holder of the Basic Qualification who has held that qualification for 10 years or more be given the equivalent to the Intermediate Qualification allowing them to use all amateur bands.”

The grandfathering of basic qualification only holders for 10 years or more would allow those of us who have been amateurs and unable to learn morse code to begin using the HF bands.

I would like to thank you for taking the time to read my comments.

If you have any questions, feel free to contact me at (905) 213-6903 or via email at va3eam@sympatico.ca.

Yours truly, Eric Mundle.

#59 - Robert Simpson


Recommendation 1
Radio Amateurs of Canada recommends to Industry Canada that the current Morse code Qualification be dropped as a requirement for operation in the bands below 30 MHz.

I agree.

Recommendation 2
RAC recommends to Industry Canada that, at the same time as Recommendation 1 comes into force, the achievement of a grade of at least 80% on the Basic examination will be required in order to be permitted to operate in the bands below 30 MHz. Achievement of at least 80% will lead to a new
qualification to be called the Intermediate Qualification. Holders of the present Basic plus Morse Qualification will be deemed to hold the Intermediate Qualification.

I disagree.

Just upping the academic qualifications as a substitute for CW makes little sense. The major complaint of amateurs today is not the lack of radio theory but an initial lack of good operating skills. There is no evidence to suggest that a higher academic score will lead to a better radio operator. Many amateurs believed that a Morse endorsement acted as an effective deterrent in keeping less than desirable elements out of amateur radio. There is no evidence to support this view and there is nothing to suggest that a higher pass mark will achieve the same purpose.

Recommendation 3
RAC recommends to Industry Canada that current holders of the Basic Qualification who have not also obtained the Morse Qualification should continue to have their existing operating privileges. That is, they will be permitted only to operate on the bands above 30 MHz.

I disagree.

The existing “Basic” operators are more than equipped with the skills and knowledge to operate in the HF portions of the bands. Many of the existing “BASIC” operators have a practical working knowledge of antennas, transmissions lines, and modes of operation that are found in the VHF/UHF portions of the amateur bands. The transition to HF operations on the lower bands should present no problem and there is no justification for re-examination. If the new license structure is adopted they should be moved into the “Intermediate Qualification”

Recommendation 4
RAC recommends to Industry Canada that any current holder of the Basic Qualification who does not also have the Morse Qualification should have the option of re-taking the Basic examination with a view to obtaining a grade of at least 80%. Those who are successful will receive the Intermediate Qualification.

I disagree.

For the reasons stated above. It would create nothing more than an undue amount of paper work and not enhance the hobby. The suggestion here is that the Morse Qualification should be replaced with a higher score on an exam. From what has been suggested this would mean that the current holders of the Basic Qualification would be at the bottom of a new proposed structure. If the new license structure is adopted they should be moved into the “Intermediate Qualification”

Recommendation 5
RAC recommends to Industry Canada that the pass mark for the examination leading to the Basic Qualification be raised to 70% at the same time as the Morse code requirement is eliminated.

I disagree.

As a delegated examiner, I have found no evidence to suggest that a higher mark leads to a better operator.
Recommendation 6

RAC recommends to Industry Canada that all persons who currently hold both the Basic and Advanced Qualifications be given operating privileges on the HF bands. In future, persons who wish to obtain the Advanced Qualification should already hold the Intermediate Qualification, or the current Basic plus Morse Qualifications, and will need to obtain a grade of at least 70% on the Advanced examination.

I agree except that the pass mark should remain at 60%

Recommendation 7

RAC recommends to Industry Canada that the present Morse code examination continue to be available to those Canadian radio amateurs who wish to have that qualification specified on their certificate.

I agree.

Only if it is required for a Canadian amateur to operate outside the country and needs to have it show on his license that he has a CW endorsement.

Recommendation 8

RAC recommends to Industry Canada that holders of the Intermediate Qualification be permitted to construct and use commercial transmitting equipment kits.

I disagree.

All proposed amateur license levels should be allowed to construct and use commercial transmitting equipment kits appropriate to their license level.

Recommendation 9

RAC recommends to Industry Canada that holders of the Intermediate Qualification be permitted to construct and use their own transmitting equipment in the bands at 2.3 GHz and above.

I agree.

Recommendation 10

RAC recommends that a new entry-level qualification be introduced, designed to ensure good operating practices and requiring only an introductory level of theory.

I agree.

I would support a new entry level qualification if it were along the same lines as the Foundation License that has been introduced in the UK.

The prospective amateur in the UK has to demonstrate a suitable level of competence by demonstrating to a delegated or departmental examiner the setting up and using a transceiver and correct “on air” operating procedures. This has been successfully implemented in the UK. New amateurs have access to the UK bands 137 KHz through 444MHz with the exception of
10M. There is a power restriction of 10 watts. The amateur is encouraged to advance to the intermediate and advanced level.

The sad fact remains that under the RAC proposal, one can still get an Advanced license without demonstrating that one can operate an amateur radio station. Demonstrating some competence might be considered impractical. Under the current CW requirement an examiner probably spends 30 minutes administering a CW exam. Not much more time would be spent assessing a candidate in setting up and demonstrating that they can put a station on the air. There are many types of licenses that are granted in Canada only after a person demonstrates a working knowledge of the subject to an examiner.

Recommendation 11

RAC recommends that all examinations on the new syllabus be divided into several elements, as appropriate, and a pass mark be required on every element.

I agree.

As a delegated examiner, I have seen on more that one occasion, a student pass the theory part of the exam but with no firm grasp of the regulations. In many respects the regulations are more important than the theory.

Recommendation 12

RAC recommends to Industry Canada that the pass mark on all elements of all examinations be set at 75 percent at the same time as the new syllabi are introduced.

I disagree.

Higher pass marks are not necessary.

Sincerely,
Robert Simpson

#60 - Chris & Laurie McGonigle

The St. Anthony Amateur Radio Association held their monthly meeting on Oct 6, 2004. There was a suggestion that the group send a response concerning whether the CW should be dropped or not. The group decided that Jeff Lush VO1LT would conduct a survey and pending on the results we would send a group approval or disapproval of the CW being dropped. Below is the questionnaire that was circulated via e-mail:

Members:

Our radio club will draft a letter in response to the latest proposal from RAC regarding the dropping of CW (Morse Code) as qualifier to allow one's use of the HAM bands below 30 MHz. Those of you who do not have the CW endorsement on your Radio License are only able to operate above 30 MHz and are restricted in the use of bands below 30mhz.
Please return by email

YES - I am in favor of the RAC proposal to drop the CW requirement

NO - I wish to keep the CW requirement as an endorsement to operate on bands below 30mhz.

Jeff N. Lush
St. Anthony M.C.T.S.

The results of the questionnaire as of October 19, 2004 were as follows:

YES - I am in favor of the RAC proposal to drop the CW requirement = 7

NO - I wish to keep the CW requirement as an endorsement to operate on bands below 30mhz. = 3

1 member abstained from commenting

From the response of the members questionnaire, 7 for and 3 against, I Christopher McGonigle VO1CJM send this e-mail on behalf of the St.Anthony Amateur Radio Association in favor and send our approval for the RAC to drop the CW requirement.

Respectfully Submitted

Christopher McGonigle VO1CJM

Secretary for S.A.A.R.A

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#61 - Ron Kolody

Comments – Gazette Notice DGRB-003-04

Of the twelve recommendations put forward by RAC, I see three separate issues being raised. The first one is deleting Morse code, the second is increasing the mark required to pass the exams, and the third is permitting people with a Basic qualification build kits on any band and design their own transmitting equipment above 2.3 GHz.

If asked a few years ago about Morse code, I would have said that the day has come to drop Morse code as a requirement for operation below 30 MHz. However, I have become increasingly aware of the total degradation of the VHF band by operators who have no regard for the rules of Amateur radio. I regularly have people ask me how long it will take to get their Morse code qualification, so they may escape the 2 metre band. In my opinion, if it requires Morse code to keep the HF bands a place where profanity is not the norm, where we can sit and listen to long distance contacts with our kids, then Morse code should remain.

The current 5 wpm Morse code requires 30 minutes of practice a day, for one month. I understand that some people cannot do Morse code, and some believe that they cannot do Morse code because they have not tried or they have had a poor teacher. The proposed changes to obtain Basic and HF qualifications will never be achievable by many people.

If Morse code is to be dropped, then it should be replaced by another exam, with a 60% pass mark, which is focused on Operating.
The changes proposed by RAC will have a very negative impact on Ham radio, and Canadians, if implemented. Under the proposed 70% and 80% pass changes, more mariners are likely to set sail, hang gliders likely to fly, hikers and 4X4 enthusiast likely to go out without their Ham licence, leaving them without essential communications. Kids are only 10 for a year, and they are unlikely to get through an exam with a pass requirement of 70% or 80%; as they get older, they are less likely to pursue Ham Radio and technical careers.

Changing the required pass grade would be unfair to the people (particularly adults) who do not have a technical background, but need the radio for communication. The non-technical people have enough to learn just to pass the Basic exam as it is. These recommendations will not make more competent operators, nor will they improve technical skills. Adults who do not want to be technicians will not become technicians just because they need a Ham radio licence. There is nothing indicating that people who achieve 80% or more on an exam are any better operators than those who do not.

It is always difficult to compare passing grades between countries, unless there is a standardized exam between the countries. If the Ham exam levels are kept as they are, then the mark required for a pass should also be kept where it is, at 60%. A pass mark of 60% is consistent with the requirement from most technical institutions in Canada, as it demonstrates a sufficient level of competency.

There is also no need to introduce entry level qualifications, as young people want the same qualification as adults, and they can achieve it. With adequate teaching skill, on the part of the instructor, young people can be as qualified to operate, and/or build, a Ham radio as any adult can.

Requiring 70% on the Advanced will preclude young people from obtaining this qualification. This is counter-productive, if the objective is to help prepare more technically competent young people. Most kids want to build, and they will go through hours of study, just to be able to build their own radio. Although the math level required for the Basic and Advanced exams is grade 9-level, I have found that kids can start working on their Ham qualifications in grade 4 or 5. At this age, the kids need to acquire lots of math skills, which is a real plus in the eyes of their parents. The kids will work on their qualifications for months, with the goal of building. Requiring a 70% on the exam will not make them, or anyone else more competent, it will unduly prolong the process for them to achieve the qualification.

Building transmitters is already covered by the Advanced exam, and there is absolutely no need to change this. Skills required to pass the Basic exam have no relationship to skills required for building; not even kits. To encourage people to build kits and “black boxes” does not further their technical knowledge, and it can lead to problems associated with not having sufficient knowledge. If we are interested in bringing people into Ham radio, and the technical fields, then we need to advance their technical skills, and that does not come with “black boxes”. Technical institutions across the country are looking for students who are qualified to enter technical programs, and Ham radio can assist in filling this need. If the Advanced exam standard is left as it is, there will be no need to pretend that Hams are technically competent because they can plug a kit together. Ham clubs need to provide more opportunities for people to build and develop their technical fundamentals.

Furthermore, there is no standard to which commercial kits are designed or engineered. Couple this with less technical knowledge, of a Basic only qualification, and we have a recipe for disaster. If a person does not have the Advanced Ham qualification they should not be permitted to build any transmitter, for their own safety and for the safety of those around them.

If Morse code is dropped as an operating requirement, all Accredited Examiners should still be fully qualified, including a Morse code certification. Additionally, those applying for a two-letter call should also be fully qualified, including a Morse code certification.

I believe that the delegate examiners should have the input on changing the grades required for a pass, since they are the only identifiable ones in the Ham community who have extensive current knowledge of the exams and results.
In my opinion, Morse code should be retained as a requirement for HF privileges. The Basic and Advanced entitlements and pass marks in Canada should remain as they are.

Ron Kolody

#62 - Jake Guertin

dear sir or madam

my name is jacques guertin  amateur radio  operator licenced calls ve2tqx and va3tqx

i am a basic plus advanced licenced

i have worked and setup many fielldays events and also helped in communication during the ice storm i have been licenced since 1991 i also am the chair person for the O,V,M,R,C radio club repeater ve3two i also have a uhf repeater of my own ve2tqx on 444.350 mhz

i am a vollentreer at ve3 jw science and tech museum
i feel if a amateur has extensive experience should be grandfather to access to voice privilege on the hf bands

thank you
Jacques Guertin

#63 - J.G. Castellano
October 19, 2004

Jan Skora  
Director-General  
Radiocommunications and Broadcasting Regulatory Branch  
Industry Canada  
300 Slater Street,  
Ottawa, Ontario  
K1A 0C8

Reference: Comments -- Gazette Notice DGRB-003-04

Dear Mr. Skora,

This document contains my comments to the recommendations issued by Radio Amateurs of Canada regarding the future of the Morse Code requirement and related matters. As a member of Radio Amateurs of Canada I feel that in this instance the organization does not truly represent my position or that of many other licensed amateurs, members or not of Radio Amateurs of Canada.

I submitted my response to the Internet survey conducted by Radio Amateurs of Canada but I have expressed my personal reserve to the Regional Director for Ontario South about the way the survey was conducted and the fact that there was no definite way to ascertain whether a person had voted more than once or was not a licensed amateur.

I take advantage of this opportunity to express my satisfaction to be allowed to express my point of view on this important matter for the amateur radio community.

Best regards,

Julio Castellano
In the following pages RAC recommendations are in **bold** while my comments follow immediately below in **italics** and preceded by my initials (JGC).

**Recommendation 1**

Radio Amateurs of Canada recommends to Industry Canada that the current Morse code Qualification be dropped as a requirement for operation in the bands below 30 MHz.

JGC: I strongly disagree with the proposal to remove the Morse code requirement for accessing operating privileges on the HF bands. The knowledge of the Morse Code is a valuable skill and must be retained for amateurs wishing to operate on the HF bands.

In page 6, RAC statement that the Morse code requires "a certain aptitude" which "not all individuals have" and "discriminates unfairly against many people" is artificial. The large numbers of persons that across the world are able to communicate with each other using Morse code should be sufficient proof that the average person is more than capable to learn it.

In page 7, RAC is blind to the fact that what is referred to as "the sub-bands now set aside for use only for Morse code communication" are in fact shared by all narrow-band digital modes (i.e. RTTY, PSK31, Packet, to name just a few). These past few years have seen an explosive and exponential increase in the number of amateurs using digital modes, all of which take place in the so called Morse sub-bands. In this regard I urge Industry Canada to mandate HF sub-bands based on the type of emission or bandwidth occupied.

**Recommendation 2**

RAC recommends to Industry Canada that, at the same time as Recommendation 1 comes into force, the achievement of a grade of at least 80% on the Basic examination will be required in order to be permitted to operate in the bands below 30 MHz. Achievement of at least 80% will lead to a new qualification to be called the Intermediate Qualification. Holders of the present Basic plus Morse Qualification will be deemed to hold the Intermediate Qualification.

JGC: I strongly disagree with the proposal to remove the Morse code requirement for accessing operating privileges on the HF bands, please refer to my comments to recommendation 1. I support the creation of an Intermediate Qualification but with a separate examination based on a question bank more profound than the one presently used for the Basic Qualification and with a passing mark of at least 75%.

**Recommendation 3**

RAC recommends to Industry Canada that current holders of the Basic Qualification who have not also obtained the Morse Qualification should continue to have their existing operating privileges. That is, they will be permitted only to operate on the bands above 30MHz.

JGC: The current requirements and passing mark for the Basic examination are very minimal and extremely easy to attain and therefore cannot entitle a holder to any privileges other than the operation in bands above 30MHz with low power and commercially available equipment. I do not agree with the removal of the Morse code requirement for the operation on the HF bands, please refer to my comments to recommendation 1.
Recommendation 4
RAC recommends to Industry Canada that any current holder of the Basic Qualification who does not also have the Morse Qualification should have the option of re-taking the Basic examination with a view to obtaining a grade of at least 80%. Those who are successful will receive the Intermediate Qualification.
JGC: I support the creation of an Intermediate Qualification but based on a separate and more thorough examination than the one actually in effect for the Basic Qualification. I do not support the removal of the Morse code requirement for operation on the HF bands, please refer to my comments to recommendation 1.

Recommendation 5
RAC recommends to Industry Canada that the pass mark for the examination leading to the Basic Qualification be raised to 70% at the same time as the Morse code requirement is eliminated.
JGC: As stated in my comments to recommendation 1, I disagree with the proposal to eliminate the Morse code requirement for operation on the HF bands. I am in favour of raising the passing mark for both the Basic and Advanced Qualifications to at least 75%.

Recommendation 6
RAC recommends to Industry Canada that all persons who currently hold both the Basic and Advanced Qualifications be given operating privileges on the HF bands. In future, persons who wish to obtain the Advanced Qualification should already hold the Intermediate Qualification, or the current Basic plus Morse Qualifications, and will need to obtain a grade of at least 70% on the Advanced examination.
JGC: I strongly oppose the elimination of the Morse code requirement for granting operating privileges on the HF bands, please refer to my comments to recommendation 1. Holders of both the Basic and Advanced Qualifications but no Morse code must be restricted to operation on frequencies above 28MHz. I am in favour of a passing mark for the Advanced Qualification of at least 75%.

Recommendation 7
RAC recommends to Industry Canada that the present Morse code examination continue to be available to those Canadian radio amateurs who wish to have that qualification specified on their certificate.
JGC: I oppose the removal of the Morse Code requirement for operation on the HF bands, please refer to my comments to recommendation 1.

Recommendation 8
RAC recommends to Industry Canada that holders of the Intermediate Qualification be permitted to construct and use commercial transmitting equipment kits.
JGC: I do agree with this recommendation. I fail to see any valid reasons to prevent a person from building transmitting equipment providing that person has demonstrated a baseline technical knowledge.
Recommendation 9
RAC recommends to Industry Canada that holders of the Intermediate Qualification be permitted to construct and use their own transmitting equipment in the bands at 2.3 GHz and above.
JGC: I do agree with this recommendation. There is little or no commercially available equipment to operate in amateur frequencies above 2.3 GHz.

Recommendation 10
We recommend that a new entry-level qualification be introduced, designed to ensure good operating practices and requiring only an introductory level of theory Intermediate syllabus
JGC: I do not agree with the creation of a new entry-level qualification. I see the present Basic Qualification as a good entry-level point.

Recommendation 11
We recommend that all examinations on the new syllabus be divided into several elements, as appropriate, and a pass mark be required on every element.
JGC: I agree with dividing the syllabus into several elements and requiring a minimum passing mark for each element.

Recommendation 12
RAC recommends to Industry Canada that the pass mark on all elements of all examinations be set at 75 percent at the same time as the new syllabi are introduced.
JGC: I agree with the pass mark to be set to at least 75% for all examinations.
While I agree with many of the recommendations laid out I believe phasing in a new system is not the proper procedure. While it will take some time to fill out three question banks, I believe it is in the best interests of the Government and Amateur Radio to implement the new syllabi for 3 levels of license at the time of dropping the Morse Code requirement.

The following are some of my thoughts on the RAC recommendations.

Recommendation 1 should have the caveat “subject to the recommendations following”.

Recommendations 2 and 4 should not be adopted as an interim measure.

Recommendation 5 should not be adopted since Recommendation 12 would set all pass marks at 75%.

Recommendation 6 should not be adopted and again the pass mark of 75% would be recommended from Recommendation 12. A further Recommendation should be the only requirement for Advanced be a Basic license. I would recommend that the new Advanced level exam only require a Basic license to allow those Basic licensees who wish to pursue high power, working on a transmitter and holding repeater station calls above 30 MHz. There is a technical need for people interested in repeater and VHF/UHF operation who do not wish to operate HF. Of course the basic level will be a prerequisite for any higher level. This allows greater flexibility in the licensing structure and it will be obvious that HF operators must have the Intermediate level which also requires the basic level.

Recommendations 7 through 12 are good as is and the justifications given by RAC in their proposal are excellent.

I would like to add that this is an opportunity to increase the skill at each level of license class and generally increase the overall quality of Amateur Radio Operators. By having a larger question bank for each level of license a greater depth of each topic can be covered.

I see the Basic level syllabus being expanded on covering the rules and regulations pertaining to operation above 30 MHz. The basic electrical and electronic theory should remain similar to the current Basic. The theory of topics pertaining to above 30 MHz can be expanded; such as propagation, antennas, transmission lines and losses and other topics. Operating practices for above 30 MHz can have more emphasis than in past exams. Of course many of these operating practices are general for any operating. The Basic level qualification should consist of at least two separate portions; perhaps 60 questions on operating and regulations and 60 questions on theory.

I see the Intermediate level syllabus being expanded on covering the rules and regulations pertaining to HF operation. The basic electrical and electronic theory can be expanded slightly at this level and reexamined. The theory of topics pertaining to HF can be expanded; such as propagation, antennas, transmission lines and other topics. Operating practices for HF can have
much more emphasis than in past exams. The Intermediate level qualification should consist of at least two separate portions; perhaps 60 or 68 questions on operating and regulations and 60 or 68 questions on theory.

The Advanced level should cover a basic review of the regulations and in particular those relating to power levels and operating. Coverage of the basic theory in more depth and advanced theory topics would also be covered. The Advanced level qualification should consist of at least two separate portions; perhaps 28 or 32 questions on operating and regulations and 36 or 40 questions on theory.

Thank You. - Bill Elliott Dated: 20 October, 2004

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#65 - Paul Burggraaf

January 10, 2005

"Recommendations from Radio Amateurs of Canada to Industry Canada Concerning Morse Code and Related Matters"

Dear Director General:

The Society of Newfoundland Radio Amateurs (SONRA) wishes to endorse the recommendations as submitted by the Radio Amateurs of Canada (RAC) regarding changes to the Morse code requirements and related matters.

SONRA agrees that the current Morse code qualification be dropped for operation in bands below 30 MHz under the RAC Recommendation # 1. However, our membership recognizes there is a level of technical competency required to operate in the HF bands along with a good knowledge of regulatory and operational procedures. In this regard, we endorse the combined changes to the grading structure of the Basic examination and the introduction of the Intermediate Qualification as outlined under RAC Recommendation #2.

Newfoundland in particular has a historic significance with respect to Morse code and SONRA members have undertaken significant mentoring of CW. In that respect, SONRA endorses RAC Recommendation # 7 that the current Morse code examination continue to be available for those Canadian amateur operators that wish that qualification on their certificates.

We also forward the positive support of the RAC recommendations from John Goodyear VO1NU an amateur from outside our Club.

The Society of Newfoundland Radio Amateurs looks forward to the implementation of the recommendations.

Best 73,

Paul Burggraaf
Club Secretary – SONRA
Regarding recommendation from radio amateurs of Canada to Industry Canada concerning morse code—I am in hearty agreement with the above proposal as outlined by RAC and I believe the sooner the better for the amateurs of Canadian radio.

sincerely Ron Reese

#66 - Ron H. Reese

20 October 2004

Recommendation 1: AGREE
Recommendation 2: AGREE
Recommendation 3: AGREE that present holders of BASIC, who did not achieve 80% in their exam, should be restricted to operation above 30 MHz;

AGREE that present holders of Basic plus Morse Code should be deemed to hold Intermediate Qualification;

DISAGREE that present holders of BASIC without Morse, who achieved 80% in their exam, be restricted to operation above 30 MHz. See further note in Rec. 4 below.

Recommendation 4: DISAGREE that present holders of BASIC without Morse, who achieved 80% in their exam, be restricted to operation above 30 MHz. If present holders of Basic achieved 80% or greater on their exam, they should be awarded the Intermediate Qualification. The Service Centre should have the exam mark information in their files, but failing that, the Examiners are required to retain examination results for five years.

Recommendation 5: DISAGREE that pass mark for BASIC be raised to 70%. The present level of 60% is sufficient to test entry-level amateur radio operators.

Recommendation 6: AGREE that persons with BASIC and ADVANCED be awarded HF privileges.

AGREE that INTERMEDIATE be a requirement for ADVANCED qualification, provided that present holders of BASIC can qualify by achieving 80% in the five years prior.

DISAGREE that the pass mark be raised to 70%. In my experience, 60% will adequately test the applicants.

Recommendation 7: AGREE
Recommendation 8: AGREE
Recommendation 9: AGREE
Recommendation 10: AGREE
Recommendation 11  AGREE. Provided, however, that the pass-mark is not raised to 70%. A pass-mark of 60% in the student’s weakest element will ensure that the overall mark will be greater than 60%.

Recommendation 12  DISAGREE. The existing passing mark of 60% is sufficient to test applicants. A mark of 75% will create an elitist view of the hobby, and discourage many individuals from achievement.

Respectfully submitted,

Edward J. Frazer

#68 - Lloyd Hofmann

September 15, 2004

Re:
Canada Gazette Part I  August 20, 2004  Notice No. DGRB-003-04
Consultation on "Recommendations from Radio Amateurs of Canada to Industry Canada Concerning Morse Code and Related Matters"

To whom it may concern:

I wanted to provide my feedback regarding the aforementioned Gazette notice. I am in favor of adopting the recommendations forwarded by Radio Amateurs of Canada Inc.

Reducing the outdated restriction of morse code in favor of higher pass mark on the existing examination is prudent and should be utilized. The exam should be relevant to the discipline involved. As an example to obtain a drivers license you must pass a drivers exam. However a Radio Amateur in Canada must pass a morse code exam, with no intention or need to ever use this means of communication. Currently emergency communication and the majority of Amateur Radio communication is conducted using other modes such as single side band or various digital modes.

Amateur Radio should be promoted in light of its beneficial role during times of emergency. Radio amateurs provide a valuable resource to the communities they are a part of. There have been countless examples of when Amateur Radio communication has provided a essential communication. Even with the level of technology which presently surrounds us, this medium continues to be called into service when every other communication method has failed. For this reason it is in the best interest of all stakeholders to promote this hobby and encourage new Radio Amateurs to join the ranks via a relevant examination process.

Canada should also strive to remain current with international standards and agreements. Since WRC-2003, led by Switzerland on July 5, 2003, more than twenty administrations have removed the Morse code qualification requirement for access to the HF amateur bands below 30 MHz.
To summarize, morse code was once an excellent medium of communication, however over the past 50 years it has become outdated and current Industry Canada regulations should reflect this. An increase in the pass mark on the current Basic exam along with quickly adopting the other Radio Amateurs of Canada recommendations benefits not only current Radio Amateur operators, but the community as a whole.

Cordially,

Lloyd Wolfgang Hofmann

#69 - John

I disagree with the removal for the morse code qualification as morse code is and always will be a great mode of communication and in times of need ie: disaster, morse code might well be the only mode of communication that is internationally understood. I also do not agree with a lot of the proposal as RAC does not represent me as an individual. I Think that the ideas of RAC are being pushed upon all of us who have an interest in this hobby regardless of membership with this organization. I was not notified by these people in writing as to this proposal nor did any person from RAC contact me asking for my approval or comments in this matter. Many of us are not members of this organization due to many factors just like this. I personally think that all licenced radio amateurs should be notified and asked if they are wanting to comment on this not just those at RAC, as they really do not represent all licence holders and I find this totally unfair to those whom do not hold a membership card with RAC as a lot of these people are unaware of these goings-ons. One has to be fair to all and notify them as most are not even aware that there is these Gazette notices available to the public, so before you make further decisions on this wonderful hobby, have the fair input of all involved before continuing. Now for my comments on this issue. I think that there should be a system like it used to be where if the morse code is dropped, there should be an exam to test for knowledge of usage of hf bands and there bandwidths etc, and a waiting period from the time one get a licence til the time they are allowed to operate on these bands if the morse code requirement is dropped. Now as for the requirement of a person needing an advanced certificate to build and use equipment, I am apposed to the being dropped. I think that there should be a multi level certification that gradually allows more privledges not simply drop this requirement entirely. Maybe perhaps allow certain items to be allowed to be constructed with an intermediate certificate perhaps. I also think that there should be again a digital certificate for those that wish to use the internet etc as a means to connect amateur radio via digital systems like the internet. This will ensure that the future candidates will be knowledgable and will be able to further contribute to the future generations of radio amateur and our communities and country. One would hope that this might also be a way of making sure that only those who truely and honestly qualify have access to these areas. Also I believe that due to the possibility of cheating on exams, I do think random re-testing of new candidates is also in order here. This will ensure that all is honest and those that do recieve certification are truely deserving of such a certificate.
#70 - Kelly McDaniel

I support the recommendations as put forth by Radio Amateurs of Canada to Industry Canada with one additional comment. As a newcomer to Amateur Radio I studied hard to pass the Basic Exam with a score of better than 80%. In fact, I scored 86% if my memory serves me correctly. This endeavor was directly related to Recommendation 2. My understanding is that my marks would be used to give me the Intermediate Qualification and subsequently allow me to operate in bands below 30 MHz. I would not appreciate having to re-exam as per Recommendation 4 and further, to pay the associated costs.

Best regards,

Mr. Kelly McDaniel

#71 - Luc Doré

Although I agree with the concept of removing Morse code competency to gain access to amateur radio bands below 30 MHz, I do not believe that Radio Amateurs of Canada's (RAC) proposal of July 2004 is the proper solution.

We, the current holders of basic and Morse qualifications would be automatically given an "intermediate" qualification along with those who would have completed, according to RAC’s second recommendation, the basic exam with a grade superior to 80%. We would have the same competencies without any difference in privileges including access to digital and Morse modes on high-frequency (HF) bands. I suggest, in order to have access to Morse and digital portions of amateur radio bands under 30 MHz, to keep an exam which requires a minimal demonstration that the amateur can transmit and receive Morse code, which is well done by the current Morse code exam at the five (5) words a minute level.

It sad to note that since the last reorganization of Canadian amateur radio qualifications, the quality of amateur radio operators has gone dramatically down to a point where, at present, the 2 meter amateur radio band has become a dishonor and point of shame for the true amateur radio operator. If transmissions heard everyday on 2 meters -- voluntary and intentional interferences, obscene language, intentional superfluous transmissions, lack of identification, transmissions
outside of band plans, business dealings -- now move on to HF, the
glory of amateur radio, I am not certain that I would want to be a part
of this new ensemble.

It is high time that the basic exam be revised and updated; that
useless sections (like vacuum tubes for example) be removed, that it
still contain sections on basic electronics, and that it even more
sections be added on proper station operation, and that the passing
grade be increased from the current of 60% to a higher value like 75%
-- much like recommendation 5.

A replacement proposal: New basic exam which, once successfully
completed, gives the same privileges as current basic qualifications -
amateur radio bands above 30MHz. Another completely different exam
comprising of a theoretical part and a practical hands-on part as an
"intermediate" qualification which gives access only to the phone
sections of the HF bands according to the Canadian band plan. An exam
where a demonstration of Morse code competency is required to gain
access to digital and Morse portions of amateur radio bands on HF --
identical to the one used today -- and finally an exam for the superior
or advanced qualification which gives the same privileges as today's
superior qualification (repeater operation, 1 KW of power output,
etc...). Rules could indicate that at minimum the intermediate
qualification be a prerequisite for the superior qualification.

The suggested intermediate exam would be made up of a theoretical
section on the use and the composition of a typical radio in more
detail than the basic exam, as well as a practical section where the
candidate has to be in control of a radio and must show his competences
as an operator.

I also suggest, as a means of qualifying Canadian amateur radio
operators and their desire to keep their license active, that the
amateur radio certificate have a expiration date just like a driving
license - or FCC-issued amateur radio licenses in the United States -
which needs be renewed at a fixed interval like 5 years for example.
This process would also achieve a verification of the information
contained in the database.
I have always taken great pride in holding an amateur radio license, and I think that it is time that the entire amateur radio community to reclaim that pride; and unfortunately we need assistance from the legislature and Industry Canada to achieve that goal. I can see it everyday in the street where people stop you and ask questions upon notice of an amateur radio callsign on an automobile license plate or a garment.

Finally, I also want to deplore the lack of support and the lack of interest shown by Industry Canada (IC) for the amateur radio community. It is quite understandable for IC to have a greater presence in segments of radio spectrum which holds income to the government but the amateur radio community is also a user of the radio spectrum along side commercial interests. The unstated attitude of IC held by the amateur radio community holds the typical response to be “clear up your problems amongst yourselves”.

To summarize on the RAC recommendations of July 2004:

Recommendation 1: Yes. Access to phone portions of HF bands only.
Recommendation 2: No. Intermediate and basic exams should be separate and focus on different points.
Recommendation 3: Yes
Recommendation 4: No. See comment on Recommendation 2.
Recommendation 5: Yes
Recommendation 6: Yes
Recommendation 7: Yes but with the note that passing the Morse code exam allows use of the Morse and digital portions of HF amateur radio bands.
Recommendation 8: No. Due to the greater threat of interference from kit construction, superior qualification should be required construction and use.
Recommendation 9: No. See comment on Recommendation 8.
Recommendation 10: No. Entry-level should be the basic level.
Recommendation 11: Yes
Recommendation 12: Yes
Yours,
Luc Doré
The proposal outlines that amateurs with a mark of 80% or better on the basic examination would receive HF privileges. I propose that currently licensed amateurs with a mark of 80% or over receive the same HF privileges. As the proposal outlines, the mark of 80% was determined by a mathematical analysis of the current exam and was selected as representative of a person with adequate technical and operational knowledge to operate on the HF bands. Also, the proposal suggests that currently licensed amateurs with the advanced qualification should be given HF privileges on the basis that they would have likely attained a high mark on the basic exam. Taking high mark to mean 80% or over, this is further evidence for grandfathering current hams who received 80% or more on their basic exams.

With regard to Recommendation 2

"RAC recommends to Industry Canada that, at the same time as Recommendation 1 comes into force, the achievement of a grade of at least 80% on the Basic examination will be required in order to be permitted to operate in the bands below 30 MHz. Achievement of at least 80% will lead to a new qualification to be called the Intermediate Qualification. Holders of the present Basic plus Morse Qualification will be deemed to hold the Intermediate Qualification."

I suggest that Industry Canada give very serious consideration to grandfathering the new Intermediate Qualification to those amateurs that have achieved a grade greater than or equal to 80% on the current Basic examination. The rationale for this is clear, as the amateurs that have achieved greater than or equal to 80% have already demonstrated they possess the knowledge to satisfy the proposed new Intermediate Qualification and therefore should be permitted to operate in the bands below 30 MHz.

Thank you.
On Saturday, 28 August, 2004, Industry Canada published Canada Gazette Notice DGRB-003-04 - Consultation on "Recommendations from Radio Amateurs of Canada to Industry Canada Concerning Morse Code and Related Matters", and invited comments. Amateurs have sixty days in which to respond.

The RAC Proposal deals with the WRC-2003 decisions concerning Morse as a mandatory qualification for HF operation in the Amateur Service. RAC has recommended that Industry Canada delete the mandatory requirement for Morse testing but leave it as a voluntary qualification as it may be required for reciprocal operation in those countries retaining a Morse requirement.

Amateurs should address comments to Industry Canada as directed in the Notice. RAC recommends that Canadian amateurs endorse this proposal.

Amateurs with questions for RAC should direct them to their regional RAC Director.

#74 - Eric F. Reid

I respectfully wish to submit my disapproval of the Canada Gazette Notice DGRB-00304 (July - 2004) on Morse Code from Radio Amateurs of Canada (R.A.C.): Recommendation 1 - That the Morse Code Qualification be dropped as a requirement for operation in the bands below 30 MHz.

My vote is that Morse Code be kept as a requirement for Amateur Radio to operate on frequencies below 30 MHz.

Morse Code is a simple skill that enhances all forms of communications. Morse Code is not hard skill to learn for any person wishing to pursue the hobby of Amateur Radio.

Morse Code is reliable when other methods of communications fail.

Please keep Morse Code as a skill requirement for Amateur Radio Communications.

Regards,

Eric F. Reid
#75 - Karel

Greetings, as an amateur operator of 7 years, I have had the opportunity to receive both basic and advanced qualifications. I have not had the chance to qualify for morse code as I believe that the basis for qualifying for operation below 30 mhz should be operator skill and syntax, not knowledge of a seldom used code.

I have operated on HF with qualified amateurs supervision, mostly during field day and contest operations, these experiences have shown me that attention to on-air conduct and operator skill are much more useful then morse code. Also, with HF availability, our ARES (amateur radio emergency services) group would be more effective.

Regards,
Karel

#76 - Joe Jansen

I agree with the proposal except that people who are already Basic Amateurs, without morse code, are being penalized. I would suggest that anyone who presently holds a basic certificate, for a period of no less than 5 years, and who obtained a pass mark of no less than 80 %, should be considered for grandfathering into being given operating privileges below 30 MHz. There are hundreds of amateurs in this situation. When the request for comments was made by RAC I asked why this wasn't being included. I was told simply, via email, to re-write the Basic exam and I could operate below 30 MHz. For your consideration.

Thank You for your time.
Josef Jansen.

#77 - Bill Sproul

Sir/Madam,

The purpose of this correspondence is to comment on the proposal submitted to Industry Canada to remove proficiency in Morse code as a qualification for the Amateur Service.

I am not an amateur radio operator, however I would like to be one. As an avionics technician in the Canadian Forces for the past 27 years, I have a sound understanding of electronics, radio and data transmission theory. What I don't have is the time or interest to spend hours and hours learning outmoded morse code, something I would never use as an amateur radio operator if I became one. Back in the early 1980s, while stationed in Germany, I wrote the theory and regulations exams and passed with outstanding results. I was up to 6 wpm preparing for the code exam, but lost interest due to the time involved in learning it.
I’m extremely pleased to hear that this proposal has been submitted to Industry Canada. It is time for Canada to move forward, as the rest of the world is, and remove the archaic code requirement. Once this happens, many individuals (such as myself) will get involved in amateur radio, which will benefit the hobby and our communities. As for increasing the pass mark for exams, I strongly endorse this proposal. People holding an amateur radio operator’s certificate must possess a comprehensive knowledge of theory and regulations. High standards will ensure only competent individuals hold a license. Those lacking this knowledge can always operate FRS or CB radios.

Thank you for considering this submission,

William G. Sproul

# 78 - Fred Orsetti

With reference to the dropping of Morse Code requirement to obtain an amateur radio operating license. I am NOT in favour of the removal of this requirement.

Thanks
Fred Orsetti
BC Section Manager RAC

# 79 - Mervyn Osborne

Morse requirement should be kept. Sometimes that is the only mode that we can use and we need a pool of people that can use it.

A year ago at Barriere BC during wildfires we lost all commercial communications. No phones, no cell phones, no power to commercial repeaters, commercial repeaters moved from the line of fire and very limited Satellite phones as there was no power to charge or operate equipment.

As in most disasters in North America, for a period of time all we had was amateur radio. In our area our VHF battery back up repeater system worked during the period. Unfortunately HF conditions were not good. Morse code was the only sure way to talk to PEP in Victoria. We were fortunate that that need never arose. Were we close? We had a train load of tourist close to been trapped on the Rocky Mountain Express plus other emergencies short lived on their own but enough to put up flags. I lived inside the circle of fire and operated the local search and rescue radio room. One of my links to the outside world did include operators that could read and send CW code. If we take the requirement out, the interest will die and we will lose the only sure way to get a message through when conditions are at their worst. Actually that is the only time anybody even wants to hear about amateur radio. Do not let a group of people who, although, are hams only want to play on radio’s. Last year when it got tough at Barriere they were not there, they were not even on their air.

# 80 - Max Brewer

DROP THE MORSE CODE......it is great for people who want to use it....and have fun with it....like old cars...and radios, we sometimes have to put them to rest....I do like the idea of raising the exam mark...
when I have time ...I will learn the morse code...maybe if I get on HF .this will want me to put more time into it ...but with work and travel...right now is not the time..
# 81 - Ronald

I agree with the RAC proposed changes and remove the compulsory aspect of CW in order to operate below 30M.

# 82 - Anthony W. Wilson

I believe the submission by Radio Amateurs of Canada represents an excellent approach to the future regulation of Amateur Radio in Canada and I fully support this submission. I urge Industry Canada to accept the proposals as written and to promulgate appropriate changes to the regulations with the least possible delay.

Sincerely

Anthony W. Wilson

# 83 - Earle Smith

**RE: Gazette Notice No. DGRB-003-04**

Following are my comments on this issue.

I am a long time member of RAC, an active amateur (both SSB and CW, but mostly CW) and have been licensed for 48 years.

I don’t have a major problem with the recommendations put forward by RAC to eliminate the Morse code requirement for Amateur licensing. I do have a problem with RAC positioning these recommendations as the consensus of the RAC membership and therefore the majority of Canadian amateur licensees.

I’m involved in 2 clubs here in Calgary (both RAC affiliates) and have never heard any discussion regarding the details of the recommendations as presented by RAC to IC.

There was a survey some time ago soliciting general opinions regarding "No Code" but as far as I know, the specific recommendations where created by an executive committee and approved by RAC directors, have not been commented on or approved by the membership at large. I would think that an important issue like this needs RAC membership approval, not just director approval, as well as input from the many Canadian amateurs not represented by RAC. Many Canadian amateurs will not be aware of this Gazette Notice as they may be members of clubs not affiliated with RAC or not members of any club and have no way of knowing this notice has been issued.

RAC only represents a small percentage of Canadian amateurs and the RAC executive, in my opinion, is totally out of touch with the opinions and desires of the membership.

I have some specific comments on the RAC recommendations as follows:

**Recommendation 1**: Contingent on much higher technical and operating qualifications.

**Recommendation 4/5**: The difference between upgrading to an Intermediate Certificate and obtaining an initial Basic Certificate based on the Basic Qualification is too small. I agree with a 70-75% pass for
Basic but an upgrade to Intermediate need to be 85-90%.

**Recommendation 7:** I agree that having a Morse qualification on the Certificate is desirable but there need to be an incentive to do so other than maintaining international licensing compatibility for an interim period.

Since Canada does not define sub-bands, I have a concern that the current “gentleman’s agreement” on maintaining a reasonable separation between CW and SSB operations will deteriorate. There may be an opportunity to tie Morse qualification to some defined CW sub bands. This would have to be IC defined sub-bands as the RAC recommendation doesn’t have the support of all Canadian amateurs. If this is not practical, there needs to be an “operating practice” that provides some measure of separation of modes of operation.

**Recommendation 10:** I don’t understand this recommendation.

Regards,

Gerry Hohn
Dear Sir/Madam:

I would like to confirm my support for removing the Morse Code requirement for operating in Amateur Radio frequencies below 30 MHz. I have been licensed for approximately four years with a Basic License and feel that this mode of communication, although interesting and useful, has lost its currency with today's technological changes. I feel that the very existence of Amateur Radio, a useful and important service to Canadians, is threatened by the current CW requirement, which is limiting the potential for newcomers - the lifeblood required to rejuvenate Amateur Radio.

I encourage Industry Canada to accept the RAC recommendation to remove Morse Code as an operating requirement for frequencies below 30 MHz.

Sincerely,

Ronald Vadeboncoeur

# 85 - Ed Evanko

It is time to move on and delete the requirement of morse code to operate on the hf bands.

# 86 - Fon Gunther

Just a couple of points to ponder:

1/ It would be good to see CW as a voluntary qualification Industry Canada keeps for 5 and 12 wpm levels, and put on licenses for those passing the exams. It would also be good to see areas of the band plan still include the morse code only.

2/ In your proposal you don't seem to take into account how long a basic holder may have been licensed. Many people having been licensed for a long time know more than some of the people who get their HF priviledges via Morse Code Qualification. We all need to learn the "HOW TO" of HF operations the same way (by doing).

3/ Many people scored well on the basic exam (above 80%). Why do they get punished under the new proposal? How many people have their Morse Code Qualification and how did it help them learn "How To" in the HF zone (If all they do is Voice Telephony)?

4/ One big question is: Will this new system actually attract people to Amateur Radio as a hobby, or will it scare many potentially good operators away?

I am new to Amateur Radio (November 2003), currently a BASIC holder working on getting the Morse Code qualification. I got 89% on the BASIC exam. Still lots to learn (and have learned lots since spending time with the Abbotsford Club). Should I bother going for my Morse Code now, or wait until you have figured out whether I will still be licensed under this new proposal?
I hope you re-think some of the proposals and the impact it will have on some people. There are Amateurs who have been licensed for years under the BASIC qualification and for "Whatever" reason didn't get their Morse Code. Why should they be passed over from the Intermediate Qualification and HF Priviledges, when some of them know more about building antennas and on-air operational protocol than some of the people who happen to know Morse Code?

I hope I am not alone with these concerns as these changes will have many effects.

Thanks
Sincerely
Ron Gunther

# 87 - Neil Sutherland

greetings:
It has come ato my attention that morse code will soon be dropped from the amateur radio service. I beleive people who want it dropped do not use it anyways and if that is sthe case why drop it. It is the only way you can get through to others in a storm because ssb gets blocked. Code is vital to the amateur radio spectrum and if you drop it more and more people will come on stream like the citizen's band radio has become. If you get rid of cw then you must get rid of amateur radio altogether. It is a part of our life inthis hobby and getting rid of it is very useless.

thanks,
Neil Sutherland

# 88 - Robert G. MacLachlan

2004 September 07

Dear Sir or Madam:

This letter is in support of part of Radio Amateurs of Canada's (RAC) proposal to remove Morse Code as a requirement for operating on the radiophone portions of HF.

I am in support of maintaining Morse Code portions of the HF bands, but do not see where the requirement to be knowledgeable in Morse Code to operate makes myself a better operator or a better person. At age of 58, Morse Code is not going to make any difference in my life. Except the requiremet to learn it will deprive me of more valuable time with my family, other activities, and job.

Like any operating mode, Morse Code should be there for those that enjoy this mode. However, learning Morse Code at this point in my life would be a waste of time and effort. I would not operate on Morse Code at this time.

One point of the RAC proposal that I do have a disagreement with is the part of not "grandfathering" current holders of the Basic level. When I wrote the Basic test, I obtained a level well over 80% and do not see why I should have to now "prove myself again". Life is to short to have to continually "prove" to someone that I (or we) are capable of being knowledgeable and competent enough to operate on HF. Certainly, earning an 80% plus already shows that I have at least the basic knowledge required to set up and operate an Amateur Radio station. I agree that I have lots to learn, but one learns more and faster by "doing" then continually writing exams. Plus, there are just too many other hobbies and activities today to enjoy.

Thanking your for your time
Robert G. MacLachlan
Dear Sir or Madam:

Thank you for the opportunity to comment on this important notice.

I wholly support the RAC proposal in this regard. In addition, I would also recommend that the basic exam requirements include testing to affirm a candidate can demonstrate knowledge of the Morse code and can at least identify Morse code characters by sight. This could be accomplished by questions on the examination. I would also recommend that the examination include questions on proper operating practices as well as the rights and recommended procedures to resolve RFI conflicts with neighbours.

Because of our close proximity to the USA, I would assume that the final decision will be sovereign yet work harmoniously with the American decision in this regard.

I wish you well with your consultations and deliberations. Your decisions are eagerly anticipated

Sincerely,

William H. Moore
# 90 - Hay-Family

**Definitions:**
Radio Amateurs of Canada - (RAC) the only national association of amateur radio operators in Canada
Amateur Radio Operator - (HAM) any Canadian Citizen who has passed a written exam and carries a certificate of proficiency of Basic (or higher) in regards to Amateur Radio
High Frequency - (HF) the frequencies in the Amateur Radio Service which are below 30 MHz

The Radio Amateurs of Canada (RAC) have submitted 12 recommendations. They have done this after apparently consulting the HAM community. This was done by a survey which was not publicized very well, and by the time people found out about it, they had very little time or were past the deadline to respond. The lack of notice was due to the fact the RAC had lost their bulletin editor at the time. Also not all members of RAC receive the bulletin and not all HAM’s are members of RAC. As such only 2.7% of HAM’s were involved in the survey. The survey had 66% in favour of removing the Morse code requirement for access to the HF frequencies. While I am confident that if a larger group was surveyed the results would be close to the same, with the majority in favour of removing the Morse code requirement. It is the other recommendation that I feel do not support the majority of the RAC members or the Canadian HAM community.

**Recommendation # 1** - I fully support as it is the wish of what I believe to be the majority of HAM’s

**Recommendation # 2** - RAC recommends to Industry Canada that, at the same time as Recommendation 1 comes into force, the achievement of a grade of at least 80% on the Basic examination will be required in order to be permitted to operate in the bands below 30 MHz. Achievement of at least 80% will lead to a new qualification to be called the Intermediate Qualification.

Holders of the present Basic plus Morse Qualification will be deemed to hold the Intermediate Qualification. I have a definite problem with this. Using this type of approach means that answering one question on the exam correctly or incorrectly will determine if a HAM is allowed on the HF frequencies or not. A simple question such as - *What is the fine for using profanity on the air?*, should not be the criteria for allowing a HAM on HF. And basically this is all it comes down to. One question answered right or wrong to determine if a person gets a score of 79% or 80%. As such I recommend that an approach similar to what South Africa has done where by a Basic certified HAM must pass one of following 5 options

1. Confirmed contacts with 100 different stations on any band and mode.

2. The construction of a direct conversion or superhet receiver or a crystal controlled transmitter for any amateur frequency and mode.
3. 50 hours of public service communication at sports events, disaster preparedness exercises and educational stations.

4. A professional tertiary qualification in electronics or radio.

5. Morse code proficiency at 5 words per minute.

Prior achievements will be recognized, so anyone who can show that they have already fulfilled the requirements for any of these assessments will be able to apply for HF privileges.

Using this type or similar approach will better ensure that the HAM is qualified. Of course I would want to see a refresher test on the radio regulations also be required, to ensure that the Ham knows the correct frequencies to operate on and is fully familiar with the regulations. A pass mark on this written test of 80% should not be a problem. I realize that IC will not want to conduct these type of verification process as it takes manpower to do so. But after talking to a number of Designated Examiners, they felt that to this verification will not be a problem, and they all felt that it would provide for better operators than just writing an exam.

Please remember that improper operation of equipment, or improper procedural practices, can result in the transmission of signals which may adversely affect HAM’s (or even radio users in other services) in other countries as well as Canada. Operation in the HF bands requires operating competence on the part of radio amateurs, as well as a good knowledge of international regulations and operating practices. Simply answering an exam will not provide for this ability. Practical knowledge of actual operating is a much better way to go.

**Recommendation # 3** - I fully support this recommendation. As you should not be able to remove what a HAM already has, just because the regulations have changed.

**Recommendation # 4** - I support this recommendation with the changes I have suggested for recommendation # 2. A pass mark of 80% on regulations only and a practical exam or verification of operating technique and knowledge.

**Recommendation # 5** - I cannot fully support this recommendation. The current pass mark for the Basic qualification was set where it was for a reason. To encourage more people to become HAM’s. Raising the bar will deter from the reason it was set in the first place.

**Recommendation # 6** - I do not support this recommendation. Just having better knowledge of electronics does not make a better HAM. I fell as I suggested in Recommendation # 2, that a practical exam on operating knowledge or verification of operating knowledge will go a lot father to ensure that a HAM is qualified to be on HF. As such I feel that if there is going to be a Basic certification and an Intermediate certification that both of these also have Advance endorsements which will garner the HAM with what is currently given for holding Advanced endorsement. Thus providing for 2 classes or levels of HAM’s with or without the Advanced endorsement. There are many Basic certified HAM’s who no not wish to have HF access, but want the privileges associated with Advance endorsement. (i.e. High power or a repeater).
Recommendation # 7 - I support this recommendation. However, just passing the Morse code will not automatically give a Basic certified HAM the Intermediate Certification. As the qualification will have changed as a result of recommendation # 1 & recommendation # 2. This recommendation is only in existence for HF certified HAM’s in Canada to be allowed to operate while visiting another country that had not removed the Morse code requirement. Very few HAM’s will ever fall into this category, but if they do, they should have the ability to prove that they meet the requirements.

Recommendation # 8 - I do not support this recommendation. For the simple reasons as I have stated in recommendation # 2. Answering one question right or wrong does not mean that a HAM knows enough about electronics to ensure that they do no pose a safety hazard to themselves or others. I fell that if you are going to build a transmitter, then you must have passed the Advanced endorsement first. Thereby ensuring greater knowledge of electronics and safety for ones self.

Recommendation # 9 - I do not support this recommendation for the same reason as recommendation # 8. Recommendation # 9 has definite safety concerns.

Recommendation # 10 - I do not fully understand what RAC is proposing here. If there is a new entry level, What is it, and where does it fit into the current or proposed levels for becoming a HAM. If RAC is proposing an easier entry point then why raise the pass mark from 60% to 70 or 75%. Leaving the pass mark where it currently is will allow for more people interested in the hobby to become HAM’s.

Recommendation # 11 - I fully support the passing of various element. However in an effort to promote the hobby and to expand the number of people who want to become HAM’s, and when trying to understand recommendation # 10, I would recommend that the pass marks for each level be as follows - Regulation 80%, operating 70% and theory 60%. Passing at these levels will give the operator the Basic qualification. And for the Advanced which should be only on theory a pass of 85% should be the level.

Recommendation # 12 - I do not support this recommendation at all. This is a detraction from the hobby, and will only stop potential HAM’s from becoming HAM’s. If RAC is serious about this recommendation # 10, then why raise the bar to make it harder to become a HAM. This is against IC thoughts or expanding the service and making it available to more Canadians.

Basically, I recommend the removal of Morse code as a requirement for HF access. In return, a HAM should write a test on Regulations with a high pass mark as well as submit knowledge of proper operating practices and ability while they were certified as Basic qualification. There are many HAM’s who already have HF qualification who are not good operators, and if we can learn one thing from other countries who have removed the Morse requirement for HF access, it should be the following which is from the Wireless Institute of Australia where they removed the Morse requirement on January 1st, 2004, and have found out that the HAM’s who are now newly allowed HF privileges are the better operators.
HARMONISATION - A NEW 'SLANT'. With the removal of the Morse code requirement for HF band access in Australia that occurred on New Year's Day this year there has been a healthy increase in on air activity on those bands. However the arrival of former VHF/UHF only licensees on the HF bands has also been overshadowed occasionally by unpleasantness. Jim Linton VK3PC believes that the lack of harmony on the bands will be short-lived and results from misunderstandings of the different cultures that exist in our hobby. --- The newcomers to the HF bands are often well practised operating on channels while the old hands on those bands follow the tradition of using any frequency, so long as it is clear and not in use by others. On a few occasions the former VHF/UHF operators have queried why others are not "operating on frequency", in other words an exact rounded off frequency channel. Some old-hands have been indignant at the suggestion they are not on a channel, and when emotions take over unpleasant references are made to no-code licensees. The new arrivals feel quite comfortable on their 'HF channels' and there are times when a territorial approach to adopted. Those new to HF may not be aware of or even appreciate the culture that has developed over many decades on the HF bands. For example, if a 'channel' is a frequency, or close proximity to one used by a DXpedition or special event station, courtesy dictates that it should be left clear for those uses. The rationale behind this is that DXpeditions and the like often carefully chose a frequency that is publicised worldwide to maximise their availability to those wanting a new country or commemorative QSL. Other annual amateur radio events do also publicise suggested activity frequencies on the HF bands for much the same reasons. A greater appreciation of the different cultures within our hobby will help increase harmony between all radio amateurs and reduce the unpleasantness and friction that has been taking place. This has been Jim Linton VK3PC for WIA National News.

Derek Hay
# 91 - Robert Calver
As an Amateur who has passed the Basic exam and 5 wpm plus 12 wpm I feel the RAC proposal is flawed. This will create a Three Tiered system using other means to keep prospective Amateurs out of the hobby, and it just that a hobby not a profession. Other countries and regions march along and we as typical Canadians muddle and doddle along, seemingly unable to make a Canadian decision without a Committee, Royal Commision to study the subject to death. The RAC proposal makes second-class citizens out of those who passed the same exam as I did. Like it was magic CW made me somehow made me more qualified to operate below 30mhz than others! RAC is not even representative of 10% of all the active licensed Amateurs in Canada. Their proposal was drafted by die-hard CW proponents, and the intent is the same to keep people out using a clever scheme of three level licensing and re-examination rather than CW as an obstacle. This decision should have, could have been made with-out going to such lengths, and wasting of time. We elect people to make decisions. Please make a decision and get on with it, time passes by and other nations seem to have no trouble implementing the ITU reccomendations, can we not do the same. Are we afraid we will upset the FCC, ARRL with a made in Canada decision? For those who visit countries still mired in the stone-age and require the sending of smoke signals or the banging of rocks to operate in their countries a CW accreditation can be given for a user fee. We look like a country of wafflers and weenies who are incapable of making a decision. We could decide not to support a War we did not believe in and here we are debating this non-issue!!!!!!!

# 92 - Graham Astbury
Dear Sir/Madam:
I would like to take this opportunity to address the current Morse Code Requirements for full access to the Amateur Bands. I have been an Amateur Operator since October of 1993, and currently hold the radio station license for VA7GA.

As time has progressed, the Amateur Service has also progressed. Amateurs have moved from using tubes, to transistors and from analog to digital. The Morse Code requirement must also change as we progress in this service. The lengthy time required to learn Morse Code, and the acknowledgement by the ITU that this standard is no longer relevant to the Amateur Service shows that it is time to remove the Morse Code requirement.

I fully support the removal of the Morse Code requirement for full access to the Amateur spectrum. I also support a new examination for access to this spectrum. I recommend an in-depth knowledge examination to cover the HF propagation, and other topics related to HF operation. This will help allow those that are committed the spirit of the Amateur Service the usage of the full Amateur Spectrum, while helping to keep to a minimum the use of this spectrum by those individuals that are not committed to the service.

Regards,
Graham Astbury, CTech.
I hold a Basic Certificate of Proficiency in Canada, and a General Class license in the United States. I am member of Radio Amateurs of Canada (RAC), and the American Radio Relay League (ARRL). I have taken and passed a test of Morse code proficiency in the United States, and frequently operate in CW. I passed my Canadian Basic examination with a score of 87.

1. I support the proposal to eliminate the Morse code requirement for access to HF frequencies.

I find the RAC proposal for doing so complex, expensive and administratively burdensome.

Other administrations have simply “grand parented” existing licensees, adding HF privileges to those previously in effect. Within the Commonwealth, this is the approach taken by Australia. I am not aware of any administration which has imposed a retest, two different pass marks for the same examination or a retroactive Morse code test requirement.

I respectfully recommend such a process to Industry Canada, with the addition of a new VHF only certificate. The existing basic examination contains a good deal of material which is specifically aimed at insuring competency and safety for HF operations.

To retest those who have successfully passed the basic certificate imposes additional costs, and discourages the stated goal of making amateur radio more accessible, enlarging the pool of those able to communicate under emergency conditions. In addition, Industry Canada would have to assume the cost and burden of administering a needlessly complex system; recertifying those already tested.

Respectfully Submitted,

Dean K. Kellerhouse

# 94 - Wayne Renwick

Dear: Sirs/Madam

In reference to the discontinuing of Morse Code by RAC members in Canada, I would like to see it dropped. In a hobby that is low on members and competing with computers, our younger generation doesn't seem interested in spending lots of time learning code. I definitely believe in a strong basic exam and a strong advanced exam to make the individual realize that Amateur Radio is a important hobby and not a fly by night game. Amateur Radio can be very rewarding to every age of individuals that enter into it.

73 Wayne Renwick VE6NWR

# 95 - Camille Roch

Je suis d'avis que l'examen en code morse doit etre maintenu pour l'obtention d'autorisation d'operer en HF inferieur a 30 mhz.

Merci de m'avoir lu.

Camille Roch

# 96 - Ralph Burgess

Dear Sirs or Madame,

With regards to the morse code requirement in order to obtain H.F. (below 30 Mhz.) privleges,
I would request that this requirement be dropped. I obtained my licence, VE6RAB, via this requirement but to my knowledge a lot of amateurs who gain these H.F. privileges drop the use of morse code as soon as they gain H.F. CW/Phone privileges. With computers & digital modems of today CW and almost all digital modes can be used at a much more efficiency. We will still be able to use this mode, but it serves no use in the licencing requirements of today. Thank-you very much for taking the time to review my comments.

Ralph Burgess

# 97 - Steve Phillips

Hi,

I want to endorse the efforts, conclusions and proposals that Radio Amateurs of Canada have made concerning the morse code requirement. I think their work has accurately captured the opinions of the majority of radio amateurs in Canada. This is validated by the actions taken by numerous other countries who have already responded to the ITU regulatory change in a similar manner. I believe that this will have a very positive effect on the future of amateur radio in Canada.

Thanks,

Steve Phillips

# 98 - Art Gladman

In response to a proposal (Gazette Notice DGRB-003-04) to eliminate Morse code as a requirement for Amateur Radio applicants seeking a licence to operate an Amateur Radio Station, I see no advantage whatsoever in the such a proposal receiving official government approval - I see many disadvantages including the potential deprivation (denial) of CW operations altogether over time.

In addition, since there can be no compelling, valid, honest, mature argument for retiring the CW requirement for Amateur Radio applicants, one tends to look elsewhere for an explanation; perhaps the reason for the proposal is to keep up appearances statistically. Being all inclusive can/may convince key operators to simply abandon radio altogether since they relate not to the group in which they have become a minority. The fiasco with GRS (aka CB) should constitute material evidence sufficient to see what could take place. The obscenities there are at almost any time intolerable; there is nothing to preclude any listener of any age yet it remains a relatively unattended morass. How does this make radio better? Since the early days of radio there have been worthy radio amateur experimenters. I am decidedly disappointed in what once was an attractive pastime cum professional augmentation for serious minded technical Canadians. For example, one such was the technologist by the name of RW Wehnert who, under Jack Hopps at the NRC, brought the Pacemaker into being who also was encouraged into such a career by serious Amateur Operators in the late 1950s, who himself encouraged me to take up electronics, who has since been quite a head turner in such things as military
communications, computerized lighting controls and interception of cipher traffic to name but a few. If the Amateur Radio operators of the 1950s had been of even today’s calibre, I would not have found it attractive. If I had not been attracted we know not what would have happened in those areas I have had the honour to affect positively. We wonder how many are alive today and leading healthy lives because of our small contributions which would otherwise have been nought.

Generally speaking, if a person is unwilling or unable to meet the well established undiluted standards, then they should properly be denied access to those who can and hold a strong self image in that regard. Allowing in one who cannot show a diligent interest in the hobby may well discourage 100 who can; perhaps it is a precursor to the entire dismantling of Amateur Radio this proposal.

If a person is inadequately motivated to meet standards and if they are permitted to operate legally in the HF bands, the demonstrated disregard for CW may well lead perhaps to bitter escalation. At times have I heard on 80 Metres VE3--- phone operators simply bully their way onto a CW QSO causing interference so severe the CW operators had to quit. Working SSB, I have been bullied several times off a legitimate QSO by those who are operating antique class equipment without due regard for others, generating spurious frequencies as far away as 15 KHz both sides of the carrier frequency. Lowering standards can have the intrinsic ability to generate more difficulties than may be predicted reasonably.

I have not been able to confirm a report I received recently indicating the military in Canada is reviewing its decision to abandon Morse code as a requirement.

Inasmuch as this response contains elements of snobbishness I feel that people should be stopped from gaining access to any organization who are not prepared to meet the minimum requirements of that organization. To swamp an organization with the less qualified is to mete out a form of negative legacy to those who made that organization so and have taken means to preserve it for future generations. To give in to whimpering is to spoil them further. Let them mature and earn their entrance, they will be better for the experience and Canada that much better off having lost one and gained the other.

I presently hold 2 callsigns, VE3DJY and VE3VDL, not an uncommon situation. I presume comments are weighed according to the number of holders and not the numbers of licences issued. If I am incorrect, I ask to be so informed in advance several days before the deadline for this survey arrives. I have submitted comments on this matter by E-mail a few days ago, and just learned that to be included, respondents are required to reply otherwise. Please consider these in addition to those comments.

Sincerely
Art Gladman

# 99 - Kent Ross
Re Morse Code Requirements

I am an amateur radio operator in New Brunswick, and presently hold the Basic + 5wpm morse code endorsement. As a new "Ham" I have recently learned the Morse Code and do not feel that learning 5wpm code is very hard, in fact I feel that it is an essential skill for any serious Ham operator. Many times a contact on SSB is not possible, but a morse code contact still works well. I’m working toward increasing my code skills and use it on a regular basis. I feel that opening the HF spectrum to NO-CODE licenses will flood the bands with less professional operators who only have experience on local VHF, and have not had the interest or drive to further their interest in Amateur Radio, by learning the code. In fact I know a number of local hams who are waiting for the code requirements
to be dropped, who haven’t had the interest to attempt learning the code, but will take the endorsement if it is given to them. I was told by my mother a long time ago that anything worth having is worth working for, the more you want it, the harder you may have to work.

I hope that this watering down of the requirements to access the HF spectrum is defeated, I’m concerned that by reducing the requirements we may we may end up with HF bands that sound like the CB frequencies, not fit to listen to.

My other concern is that if code is dropped that the influx of voice only operators will start to infringe on the frequencies that have been traditionally reserved for code, and other types of non-voice communications. These frequencies must be preserved for those who wish to operate in code, or other types of non-voice communications.

I also believe that the survey by RAC does not show the true feelings of the average Ham, I feel that it was poorly promoted, too short of a period, and weighted heavily in favor of those who want the code dropped, (most of the people who had a strong feeling about it were those looking for an easy way to get their HF privileges) I was not aware of this survey till it was too late to make my feelings known.

Please consider the consequences of this action and how it will impact Amateur Radio, before making a decision on this matter.

Sincerely

Kent Ross

#100 - Nigel P.

Dear Madam|Sir:

In response to your requesting comments regarding implementation of no code licensing, I would like to make the following comments and be as brief as possible.

The proposal of a no code license, on the surface, one would have thought should have been a straight forward “yes” or “no” situation. Although I have been a member of RAC for several years, I have been in disagreement with several of their ways of operation, etc. What should have been the above “yes” or “no” turned into multi choice situation for you as I understand it from RAC’s perspective.

When I took my Basic course, we were told by our instructors that this was it for Basic operation. Now we are told, and I stand to be corrected, that those exams that were taken 5 years ago should no longer be considered valid if one wants to work HF in a no code situation. A proposed passing mark of 80%, I believe is what RAC putting forward.

As I said above, I will try and keep this note brief. In your considerations, I urge you to consider a
“grandfathering” situation whereby those currently holding Basic qualifications be allowed to operate HF in no code situation. If RAC feels that past exams formulated by them are inadequate then start immediately with new courses that are felt to be adequate. Please don’t penalize hundreds of us who took and passed the Basic course in good faith.

It is not acceptable that the rules be changed for those who have already undertaken and achieved an acceptable level of proficiency in this field.

The proposal by RAC is exclusive in nature to those who have already passed their Basic qualifications with a score below 80%, despite this being acceptable to both RAC and Industry Canada prior to this discussion point arising. Given the RAC’s recommendation to exclude HF privileges for those with a score of less than 80%, I am compelled to appeal to Industry Canada to remove this stipulation from the Gazette Notice.

Yours sincerely,
Nigel P. Service

# 101 - Christian Bilodeau

selon moi le code morse devrais etre abolis au canada pour avoir acces au bande hf.
cela permettrai a bien des gens de profiter
des bandes hf comme loisir.
pour tout ceux et celle qui detienne une licence actuellement.
pour les nouveaux et nouvelles amateur la note de passage devrais passé a 70 % et traité des faons de se présenté sur les bande hf sur quel frequence on fait de la phonie. ect
avec tout les moyens de communication présenent internet le morse est peut etre un peu depassé je suis d avis de permette aux amateur qui detienne une licence de base ou superieur de leur permettre la game de frequence hf.
merci bien a vous
christian bilodeau

#102 - Denis Mallet

Contact, emergence In Remote Area will be needed again. Now if no one know the code there will have WHAT for communication? I like to keep the morse code 5 word per/minute mandatory ,it is not that hard to learn  morse code. I Respect Your Opinion.

# 103 - Randy McLellan

September 1st 2004

I think it is appalling that any amateur radio operator would even think about dropping Morse code! Morse code is a very useful, historical and interesting part of our hobby. Dropping it would be like dropping you dear old grandmother.
Also we (the amateurs) should keep this in mind. HF used to be more difficult to get on. You would have to really want to be on HF because you had to work for your privileges. As we drop this requirement and that requirement the quality of the amateur on HF is going down. I had to work to get my privileges, which are being given out now.

My suggestion: Go back 20 years… with 12wpm and advanced licenses.

I am not opposed to change as long as it is for the better.

DO NOT MAKE OUR AMATEUR BANDS GLORIFIED CB BANDS.

Thank you for allowing me to give my 2 cents.

Randy McLellan

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# 104 - Mario Vaillancourt

August 28, 2004

I have read Radio Amateur of Canada's recommendations to Industry Canada and I do NOT agree on one specific point.

If RAC's recommendation is implemented, radioamateurs currently holding a basic licence with no morse code proficiency will either need to pass the morse code test or to pass a new written exam with a higher pass mark than 60% if they want to have access to HF frequencies.

This recommendation is illogic. Currently, passing the morse code exam does NOT mean that one radioamateur is more knowledgeable in radio electronics and radio rules. RAC is attempting to put up another barrier to the access to the HF bands by current basic level radioamateurs not holding the morse code proficiency.

Historically, Industry Canada has never required of radioamateurs who passed the morse code exam to upgrade to a higher level of knowledge in electronics, radio operation and regulations. Higher knowledge was not a prerequisite to access HF, but morse code was, and morse code is not anymore required by the IARU, the International Amateur Radio Union.

Industry Canada should do as numerous european & south pacific countries have already done: open the HF band to all current and future radioamateurs. The hobby is dieing, there is no better way to revive it than making it more user friendly.

Thanks for your interest in the hobby.

Mario Vaillancourt

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# 105 - John Bain

The proposal as presented by RAC does have merit in its attempts to correct deficiencies in the current exam process. The recommendation to retest basic licence holders to an 80% level however is the equivalent to retesting drivers to a higher standard pending the opening of a new super highway. RAC's argument that basic licence holders could have obtained a pass mark by guessing a substantial number of the answers while theoretically possible, lacks credibility. You must note that this situation has existed for years without RAC complaining at all. Only when morse code was brought into or eliminated from the equation did they start to scramble for reasons to protect the HF bands from Basic licence holders.

Granting HF access to present holders of an Advanced licence based on technical capability is acceptable but to say that they hold any more operating skills in the HF bands than a holder of a Basic licence is also un-substantiated. The only equitable solution would be to change the existing exam passing grades going forward and grand-father in the previous holders of the "Basic" licence. I hold only a basic licence and passed my test with an 87 if RAC's recommendations are allowed would I be able to
submit and affidavit from my examiner in lieu of submitting to a re-write? How many current hams operate all solid state equipment but passed all of their technical tests in the days of vacuum tubes? Perhaps they should have to re-write as well. I think you can see where this is going. Change the pass mark, fine, do it current, from this date forward you can't go back and re-write history.

# 106 - Michael Eliuk
By removing Morse Code altogether from HF Band, the BASIC, INTERMIDIAD and ADVANCED Written Exams should filled for HF Certificate. Basic & Advanced Certificates SHOULD NOT BE "GRANDFATHER" for HF coverage. Written Exams should be at(1)BASIC 80% (min)(2)INTERMEDIAD 85% (min)(3)ADVANCED 85%(min)
Please, No Favours.
de Michael

# 107 - Gerry Hohn
I am a long time member of RAC, an active amateur (both SSB and CW, but mostly CW) and have been licensed for 48 years.

I don't have a major problem with the recommendations put forward by RAC to eliminate the Morse code requirement for Amateur licensing. I do have a problem with RAC positioning these recommendations as the consensus of the RAC membership and therefore the majority of Canadian amateur licensees.

I'm involved in 2 clubs here in Calgary (both RAC affiliates) and have never heard any discussion regarding the details of the recommendations as presented by RAC to IC.

There was a survey some time ago soliciting general opinions regarding "No Code" but as far as I know, the specific recommendations where created by an executive committee and approved by RAC directors, have not been commented on or approved by the membership at large. I would think that an important issue like this needs RAC membership approval, not just director approval, as well as input from the many Canadian amateurs not represented by RAC. Many Canadian amateurs will not be aware of this Gazette Notice as they may be members of clubs not affiliated with RAC or not members of any club and have no way of knowing this notice has been issued.

RAC only represents a small percentage of Canadian amateurs and the RAC executive, in my opinion, is totally out of touch with the opinions and desires of the membership.

I have some specific comments on the RAC recommendations as follows:

**Recommendation 1**: Contingent on much higher technical and operating qualifications.

**Recommendation 4/5**: The difference between upgrading to an Intermediate Certificate and obtaining an initial Basic Certificate based on the Basic Qualification is too small. I agree with a 70-75% pass for Basic but an upgrade to Intermediate need to be 85-90%.

**Recommendation 7**: I agree that having a Morse qualification on the Certificate is desirable but there need to be an incentive to do so other than maintaining international licensing compatibility for an interim period.
Since Canada does not define sub-bands, I have a concern that the current “gentleman’s agreement” on maintaining a reasonable separation between CW and SSB operations will deteriorate. There may be an opportunity to tie Morse qualification to some defined CW sub bands. This would have to be IC defined sub-bands as the RAC recommendation doesn’t have the support of all Canadian amateurs. If this is not practical, there needs to be an “operating practice” that provides some measure of separation of modes of operation.

**Recommendation 10:** I don’t understand this recommendation.

Regards,
Gerry Hohn

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# 108 - Gus Marche

I currently hold a Basic qualification and have been licenced for about four years. Due to my employment and the popularity of the amateur radio hobbie, I have been fortunate to have met a substantial numbers of hams since receiving my call. I have been involved in many discussions concerning the requirement for CW in order to TX below 30mhz. The general concensious is always the same and that is to discontinue the CW requirement. I have always associated CW with the Military and specifically the Navy, however, the Navy does not even train their personal or do not seem to place any priority on CW at this point. My Son is in the Navy and CW was not part of his training even with his trade being in communications on ship. My take on this is that if our Military does not see the need, then why are we continuing to persue old technology and deterring prospective good candidates from taking up the hobbie. We must actively continue to promote Amateur Radio use as it continues to prove itself over and over as an extremely important communications network for Emergency Management Agencies across the Nation. Our current membership is an aging one and we must do everything possible to attract the younger groups but at the same time not to reduce its intregrity or allow Amateur Radio to be known as a non-professional identity.

Thank you.

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# 109 - Forbes M. Purcell

As a ham radio operator, a communications tech for Alberta Sustiaible Resources, involved in many forms of emergency communications and a former Radio Inspector with DOC, I do not see any requirement to maintain Morse Code as a requirement for HF operations.

I became convinced with this when on a long range communications exercise with the Communications Reserve in the Canadian Forces.

We were to be in twice daily contact with Penhold, Alberta as we travelled up and down the Alaska Highway. After many attempts to make contact and frequency change drills. I finally sent our contact report in Morse Code and out of 20 Regular Force staff on duty in Penhold no one could read Morse Code. I was convinced that if the CF had dropped Morse Code why were we still using it at all.

The only time since then I would say Morse Code has some merit was from watching the movie Independancy Day.

I fully endorse the proposal put forward by the RAC.

Thankyou
# 110 - va2boa@rac.ca

je suis radioamateur depuis beaucoup d'ans,(ex: i5...) je crois que maintenant soit le moment juste
d'abandonner le code morse comme examen, meilleurs avoir des bons radioamateurs, connaisseurs de la technique et expérimentateurs des nouvelles technologies, et pas seulement amateurs nostalgiques de la touche, je crois aussi que soit une bonne idée donner à tous les radioamateurs une classe unique et toutes priviléges, tel à expérimenter toutes les frequences et toutes les manières de transmission, je ne crois pas que soit necessaire d'augmenter la difficulté' des examens, plutôt faire des preuves de transmission en onde courtes.

# 111 - Steven Nikkel

With somewhat of a selfish motive, I feel it would be beneficial to grandfather all or some portion of past exam scores for the basic qualification and provide them with the additional privledges recommended to those that obtain >80% on the exam.

Having just taken the basic qualification exam this past January, I was aware of the proposed changes and took the exam on the assumption that obtaining a good score would allow me the additional privledges recommended if the proposal was accepted. Having obtained a mark of 96%, I'm a little annoyed that I may need to retake the exam within short period to obtain those privledges.

# 112 - Garmax

I was reading the proposals for removing Morse Code as the qualifier for operation on the Amateur bands below 30M. As it sits I do not agree with it. I did my basic exam close to 15 years ago and I just was not interested in code. I have been waiting years for this to happen and enjoy some more spectrum. Now the thought is to make me do the exam again and at an increased passing rate. That is a money grab and a power thing on behalf of the old boy's club in my opinion. I say remove the code and let those of us interested in the hobby enjoy the extra communication.

Thank you for listening to my concerns. I hope the idea is done in a fair manner to those of us who have been involved in the hobby for several years..........Gary A. Parsons(VE6GAP)

# 113 - Don Silver

I would respectfully submit that Morse Code is only one of several transmission modes used by present day amateur operators in this country and worldwide. I would there for agree in having this mode remove from the requirements to operate below 30 MHZ.

As per R.A.C.'s submission to have all BASIC amateur operators re-tested to obtain a test score of 80% . What, if any consideration is to be give to present Basic operators with regards to past effords and experience. It has been several years since I write the I.C. test and that time I obtained a score higher than 80%.

I would respectfully submit that ALL amateur operators be "GRAND FATHERED" with full operating privileges below 30 MHZ and that any changes to the present licencing/testing process apply to new applicants

Thanks in advance

Don Silver

# 114 - Ed Skinner

I would like to go on record as being in favor with the recommendations made by Radio Amateurs of Canada concerning Morse code. It is good to see that Industry Canada is beginning to realize that
proficiency in Morse code should not have to be the only requirement for access to the HF amateur bands below 30MHz.

Regards

Ed Skinner

# 115 - Don Silver
I fully agree that morse code should be dropped as a requirement to operation Amateur radio frequencies below 30 MHz, as this is only one of several mode (ie: phone transmission, digital transmission, SSTV transmission, etc).

As put forth by R.A.C. that BASIC licence holders, be required to be re-tested to obtain a test score greater than 80%. It has been several years since I write the I.C. test and at that time my test score was above 80% (this should be on file).

I would respectfully submit, that amateur operators that presently hold a BASIC class amateur licence be give fully privileges below 30 MHZ, without any further testing or up-grading of the licence class. As put forth by R.A.C. that BASIC licence holders, be required to be re-tested to obtain a test score greater than 80%. It has been several years since I write the I.C. test and at that time my test score was above 80% (this should be on file).

I would respectfully submit that ALL present licenced amateur radio operators regardless of class should be "GRAND FATHERED", and have operating privilege below 30 MHZ. And that any new amateur radio testing apply to new licence applicants that write the I.C test after an implement date.

Thanks in advance

# 116 - Norbert Glatz
RAC has recommended that Industry Canada delete the mandatory requirement for Morse testing but leave it as a voluntary qualification as it may be required for reciprocal operation in those countries retaining a Morse requirement.

I fully endorse this proposal.

Norbert Glatz

# 117 - Scott Stewart
The spirit of this legislation must be to encourage amateur radio while still regulating the operation to keep it within reasonable limits.

I have read the recommendation made by RAC with respect to the new licensing for Amateur Radio. I agree with most of the discussion however I cannot agree with limiting access below 30 MHz as recommended by RAC. In the past one was not allowed to operate below 30 MHz without qualifying in code. One would assume that since there is a good deal of code in those bands that qualification was in place to ensure that all operators understood the traffic.

Since the requirement for code has been removed the bands should be open for all licensed operators not just those who have written the new exam and have obtained a higher score on the basic test. I cannot agree with this restriction that is simply in place because it can be or because it will force operators to study harder. I suggest that it is contrary to the Charter of Freedoms. In that it is a limitation of a freedom that cannot be demonstrably justified. The code requirement was reasonable and could be justified. I cannot image how the higher pass mark should be required for less than 30 MHz and not over 30 MHz. If it is believed that operators need a higher knowledge level then raise the pass mark for all bands.

If you accept the recommendations of the RAC as written you will allow an existing operator with a Basic
licence and code to operate below 30 MHz even though he may have scored 60% on his basic test. However, his fellow who may have scored 79% on his basic and who does not have code can not operate below 30 MHz until he re-writes the basic test. Even though code is no longer a requirement. You can not demonstrate why the restriction on the second operator's freedom is in place. Therefore, I suggest it violates the charter.

Certainly you have the right to put the legislation in place and wait for a charter argument that may or may not take place. I believe that this legislation should be written in such a way that it will not precipitate a charter argument in the first place. In that way it will be stronger overall and other sections will not fall victim to the same challenge.

I strongly recommend that you allow all licensed operators' access to the bands below 30 MHz. Alternatively "grandfather" all existing "basic" (code or no code) operators into an "intermediate" license that would allow access below 30 MHz. That would at the very least be fair to existing operators. The third option would be to exclude all "basic" operators from under 30 MHz regardless of code qualification until they re-write the test. This option is not desirable in that it would remove an existing freedom from a large number of operators, it would force many radios into silence. That would be contrary to the spirit of this legislation.

Thank you for taking the time to read my comments

Scott Stewart

# 118 - Paul Saunders

Dear Sir,

I support the above notice. I would like to see in addition to the removal of the morse requirement a changed basic exam with a higher pass mark plus the introduction of a novice type licence, like the UK introduced.

Regards

# 119 - Brian Shanks

Good Morning;
I support the change for removing the requirement for Morse Code. The difficulty in attracting new HAMS for young people and developing the advanced staff requirements have been impeded with the Morse Requirement.

Also the meeting of the International Requirement changes will keep us in step with the field.

Thank You.

# 120 - Brian Trapnell

Re the upcoming change re morse code.
I think it should be retained for many reasons, too numerous to discuss here. This is just a comment but I fear it will be lost.

# 121 - Gregory Franklin

I have been an amateur radio operator in Canada since the early 1980s. I am in favour of total abandonment of government regulation pertaining to morse code in the amateur radio service. I trust that amateur radio operators who are interested in pursuing the morse code aspect of their hobby will learn the techniques necessary to conduct themselves appropriately on air. I also believe that government regulation pertaining to morse code serves no useful purpose at this point in the hobby's evolution; rather regulation discourages hams from pursuing HF operation of their hobby. As the HF operation of amateur radio provides backup to the existing communications infrastructure in Canada in
the event of an emergency, government regulation should not discourage amateur radio operators
participation in this aspect of the hobby by morse code regulation.

Sincerely,

Gregory Franklin, BSc, MBA, MD

# 122 - Adam M. Farson
Dear Sirs,

I wish to place on record my comments to the effect that I am in favour of the abolition of the Morse Code
proficiency requirement as a prerequisite for obtaining a Canadian amateur radio licence.
I would also favour a tightening of standards, such as an increase in the pass mark and/or more difficult
written examinations, as a replacement for the Morse Code qualification.

Yours faithfully,

Adam M. Farson

# 123 - Robert Smith
I agree that the amateur licensing system does need to be adjusted.
I do, however have some suggestions to try and ensure new people will join the amateur
community without being discouraged due to failing the exams.
suggestion 1.
Continue to allow the current basic pass mark, and current priviliges.
If the person gets greater than 80%, grant them an intermediate license.
If they get 60%-79% grant them the basic qualification and allow the opportunity to rewrite the exam, or
take a morse code test to move them into the intermediate qualification.
Suggestion 2.
Do not raise the pass mark of the advanced qualification. The bar is already there and is high enough!
Technically gifted people should have no trouble acing the advanced exam. It is the other people who
struggle with the theory and concepts embodied in the advanced qualification that I suggest will realize
their learning has only just begun, But only if they are allowed the freedom to experiment with the
technology amateur radio is based on.

Thank You,

Robert Smith

# 124 - VA3AMY & VA3JRS
We feel that we have already wrote our lic. and passed. On it were all kinds of questions that covered not
only 2 metre but all bands. We feel that we have wrote our exam once and passed,therefore we shound
be grandfathered.

Thanks

# 125 - Douglas Austin
August 30, 2004
Attention: Industry Canada

Thank you for the opportunity to comment on the above proposal.

My view is very simple in that I support the proposal to remove Morse Code as a mandatory requirement for access to the HF Bands and to leave it as voluntary considering the nature of HF and communications with other countries who may retain it in their regulations.

Thankyou,

Douglas Austin

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# 126 - Tien T. Dao

Keep the morse code requirement.

Increase pass grade to 75% for Basic exam.

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# 127 - Wayne Clifford

I think that a person who has already completed the basic exam with a passing mark of above 80% within the last three years, (as examiners are required to keep the results of exams for this period) should be automatically allowed HF PRIVILEGES without retaking the Basic exam.

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# 128 - Eric Gauvin-Dufour

À qui de droit:

J’aimerais vous faire part de mon commentaire, j’ai pris connaissance du document que RAC a soumis à Industrie Canada, et j’appuie à 100% les recommandations faites sur la nouvelle réglementation, en effet la marine n’utilise plus eux même le code morse comme moyen de communication.


Je crois que d’enlever le code morse serait d’offrir à ceux qui ont les connaissances sans avoir l’intérêt d’utiliser le code morse, de faire des nouvelles expérimentations sur les bandes HF, et offrir par le fait même la chance d’utiliser le spectre de fréquence Alloué pour le service de la radio amateur.

Il ne sert à rien de vous dire, qu’advenant le cas ou le code morse serait aboli pour avoir droit au bande HF (30Mhz et moins), que je serai dans les premiers et avec grand plaisir à faire le grand saut, et faire de l’expérimentation sur cette gamme de fréquences !!

Merci de porter votre attention à la communauté Radio-Amateur du Canada.

Eric Gauvin-Dufour

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# 129 - L. Stephen Coker

I am in favour in dropping 5 wpm for amateur examination requirements, although it could remain as an optional exam for those interested or planning to go to another country where they would still need the requirement presently.

I have been a delegated examiner for IC for many years. The internet and even satellite TV has lured away some bright minds in our country who would benefit from amateur radio. I personally love Morse Code and it is useful in emergencies but it also hinders growth in our service.

Thank-you
# 130 - Joe Mckenna

Hello

I've been a amateur operator for over ten years and in this time period have seen less interest from young people in our hobby each year. I do understand the concerns of some of the operators that have been on the air for many years and are worried that dropping the code may bring operators that are less desirable on the amateur bands. No matter how difficult the exam is you will still have that element there and already do. Our children are now communicating world wide through the internet and now we as amateur operators are also using this resource for communications on H.F.UHF.VHF as a reliable way to communicate during low periods of our eleven year cycle. In order for H.F. to grow and prosper I believe we should drop the code as a requirement for H.F. and maybe raise the passing mark. I think at first we may have a influx of basic operators onto the H.F. bands but this drop off. And it will be up to the more experienced operators to elmer these operators. Otherwise with the new technologies available now and in the future our young people will find an easier way to communicate.

# 131 - Robert Calver

I do not agree with the RAC proposal concerning morse code as testing requirement and the development of a three tiered system. Why am I any more qualified to operate H.F because I passed 5 wpm and 12 wpm, I did write the same basic exam as many others. This proposal indicates that some how a person with code is more qualified even though they wrote the same exam. So we are just discriminating and excluding people using other methods rather than code to keep people out. Can we not make a Canadian decision without being at the apron strings of the ARRL and the USA.

# 132 - R. Beck

R. Beck                                                                              29 August 2004

Dear Sirs:

I would like to support the removal of CW (morse) requirements for Amateur Radio HF. Many countries are doing this now. I am a life long CW man and love the mode and feel sorry for the poor knuckleheads who don’t have the GUTS to learn the code and know they will lose out on one of the fantastic aspects of Amateur Radio, even though they do not realize it. However, morse is no longer a requirement for emergency services, is not used commercially or by the military any longer so the inclusion of morse requirements for HF, in the Amateur Service, can only serve a purpose related to hobby and not the other important aspects of Amateur Radio. Many amateurs rose through the ranks and became commercial CW operators or were an important resource in times of war. This is no longer the case, as far as CW is concerned. This requirement has served its purpose and it is time to put it on the shelf. I think it is now more important to encourage more people to join the ranks as Canadian amateur radio operators and make use of the HF spectrum we have. If we don’t use it, we can lose it.

I also support the RAC suggestion that morse testing still be part of an amateur exam if the examinee so wishes and that an endorsement be made on the license indicating the fact that the morse testing has been passed. A suitable seal or label could be affixed to the license confirming this fact, in case of reciprocal licensing requirements in other countries.

Regards,

Reg Beck

# 133 - Ron Gravelle

As a volunteer for Environment Canada and the Region of Waterloo for severe weather, I do not in any way, feel the morse code should be a viable requirement to amateur radio emergency communications.
The Regional and city EMO Officers and public service volunteers do not know, use, or understand in any way, shape, or form, the morse code or even want or need to know it.

Would good would it do to know and use a message system if the community public service personnel do not use or understand it themselves? All they need to do is to provide real-time "radio" communications to assist emergency "radio" traffic for Hospitals, Police, Fire or Ambulance or other "radio" dependant response personnel, such as REACT.

The key here is to provide emergency "radio" traffic assistance when it is needed the most.

If the need is under VHF/UHF radio frequency capability, it should be able to be provided as it is needed by the ARES personnel who are willing to volunteer their equipment, time and expertise. We should not be restricted to 50mhz and above for local or long distance emergency "radio" if the need is there, and it is only a matter of time before the need will be apparent. This requirement should be dropped for the good of all concerned.

Ron Gravelle

# 134 - Donovan Hoggan

I am in complete support of all of the RAC recommendations.

# 135 - Bob Hawkins

The RAC proposals for changes in the licencing regulations are generally quite good. I wish to address specific recommendations from that document rather than general agreement or disagreement.

The dropping of Morse Code as a requirement for HF access is in keeping with the spirit of WRC-03. I support the retention of code testing for those foreign jurisdictions requiring it and as a category on the issued licence. I would like to see a 12wpm endorsement added to the Canadian licence if other countries require 12 rather than 5 wpm for their licences.

Industry Canada should clarify the 80% requirement for the Intermediate Qualification pending new question banks and an exam generator. Those having the Basic Qualification who passed during the previous 5 to 10 years with 80% or better should be automatically upgraded. This may be verified either from the records retained at Industry Canada or by accredited examiners resubmitting exam scores. A new form should be produced to accompany such submissions to verify their validity at Industry Canada. This will greatly reduce the friction generated by requiring Basic Qualification holders be retested. I have talked to several licenced amateur radio operators who are upset at having to be retested. This should ensure that those who have earned the upgrade to HF by prior hard work be properly rewarded.

Those with both Basic and Advanced Qualifications have already earned their upgrade.

The addition of an entry level Qualification similar to the UK Foundation licence is of exceptional merit. Unfortunately the RAC proposals do not adequately describe the requirements, qualification (UK Foundation licence holders have limited low power HF access) nor relationship to the Basic, Intermediate and Advanced licences. Much work needs to be done before such a licence can be introduced here.

The raising of pass marks on examinations is a mixed bag. It is currently possible to pass either Basic or Advanced (60%) by a minimum of study and good guess work. A passing grade of 70% for the present exams is easy to implement. This does mean the difference between passing (70%) and obtaining the Intermediate Qualification (80%) is very narrow using the present exam generator. I would prefer keeping the present passing grade, or upping it to 65% to allow some useful difference between passing the Basic or Intermediate Qualifications pending a new set of question banks and exam generator. Rasing the pass to 75% can come with the new banks.

The use of multipart exams and the requirement to pass all parts is, in my opinion, a proposal hedging on disaster. As a professional educator as well as an accredited examiner, I feel this is not the way to go
regardless of the good reasoning presented in the RAC proposal. I for one do not want to explain to a student why they should fail with an overall grade of >90% while another candidate passes with a grade of 75%. This is a normal scenario in multielement tests with compulsory element passing. Having a bad day on one topic may cause an unjustified failure, in my opinion. I do agree that there should be an expansion of the question bank so all elements are more equally represented and the likelihood of a few questions always appearing be reduced. This multielement proposal raises my workload as an examiner without a commensurate improvement in student answers. I feel it would be much more productive to keep the pass mark at 75% (or whatever) for the entire test (no requirement to pass all elements individually) and to make the question bank into a choice of 5 responses instead of 4 per question as it is now. If the selection of responses is well written for each question, this reduces significantly the impotance of guessing while improving the validity of the test format.

I hope Industry Canada can begin moving on these changes, as there is a great amount of work to be done beyond the dropping of the Morse Code requirement for HF.

# 136 - Thompson

Why is the govt listning to RAC, when they only represent 17% of the amateurs in this country??? THEY ARE STILL ANNNOYED BY THE FACT, THE GOVERNMENT DIDN'T HAND OVER ALL THE LICENCING TO THEM(RAC)SOME YEARS AGO!!! AND WANT TO CREATE MORE HOOPS TO JUMP THROUGH.. WE WANT GREATER USE OF THE FREQUENCIES, AND THATS NOT GOING TO HAPPEN BY MAKING THE LICENSING REQUIREMENTS TOUGHER. AS WELL, I AM SURE THE GOVERNMENT ISNT INTERESTED IN RAC PROPOSALS THAT WOULD CREATE A MANAGEMENT NIGHTMARE...TL THOMPSON. CALGARY

# 137 - Stuart Hickey

Well thought out and presented. I am in total agreement, as are my wife VE6CYN, son, VA6KBH, and my daughter VA6CNH. Amateur radio can only benefit from this move as will the overall 'population' of hams in this country. More interest in amateur radio will mean more hams and more people able to provide 'global' access for public service in times of emergency.

# 138 - Russell Farrell

I believe that the morse code requirement be removed and the pass mark increased to obtain an Amateur Radio Licence. The holders of a Basic & Advanced licence would be granted full operating privileges on all of the Amateur Radio frequencies with no restrictions. Yours Russell Farrell

# 139 - Jacqui Clay

there shouldnt be a cw requirement this the 21 century,,an iq/apptitude test would be a better measuring stick..

# 140 - Tim Thompson

get rid of the dinoursaur, cw is fine to use but take it out as a licencing requirement,and grandfather all present licence holders into h.f.

# 141 - Rino Deschenes

Before we delete the morse code in Canada, I like to raise a few things that I believe are important to the amateur radio, first I like to keep the morse code 5 word per/minute mandatory ,it is not that hard to learn morse code
at 5 word per/minute when somebody want to be part of some sort of hobbies there always a few things to learn and morse code is not impossible. Also there are qrp, Homebrew and all Hams With Modest station/antenna not Everybody Is Able To Have Big power, tower, beam And big antenna, which Cost Money And most of The time Space Is Not available, so To Compete With Others And Propagation Morse Code is Very Important To Them.

Dx-expedition To Near Location, near Island, near mountain Are important To Local Clubs And Help Hams To Have fun together, a lot easier To Set Up Small Radio Station And antenna For The weekend Than A Big Station, so Morse Code is Often The Way To go.

Morse Code Is Part and Root Of Amateur radio Not A Wall that can’t Be Climbed.

Morse code Can be Done With Earphone Without Disturbing The family Or Others Peoples In The Same House Or Apartment, old ages Peoples Living In Old Ages Peoples Houses And Peoples living In Apartment Where There Is No space For A Private room For The Radio Station Are A Example And A Good reason Why Should Try To keep Morse Code alive.

Propagation, location And Noise make That Often Morse Code is the only Choice For A Solid Contact, emergence In Remote and isolated Area Where Small Station Are Often The Standard.

We Must Keep And Protect Morse Code In Amateur Radio as it is a Important Part Of it, And we Must Also Continue to Work With The News Mode There Is place For everybody, deleting The Morse code Will Not Help Our Hobbies.

This letter is my Personal View And opinion About Morse code I like To Say To All Others That Don’t Share My Ideas That I Respect Your Opinion And Ideas, together We Can build A better Tomorrow As long As We Can Talk To Each Others and have Respect To Each Others.....73....

Rino Deschenes.
# 142 - Robert Meldrum

I would suggest that if Industry Canada drops the Morse Requirement for operation under 30MHZ it should require those individuals who currently hold a basic licence to pass a further test on operating procedure, interference and HF propagation in order to access the bands under 30mhz.

Robert Meldrum

# 143 - John R. Koren

I disagree with the RAC proposal to eliminate morse code as a requirement for examinations. Under the current RAC proposals, there is no indication of the level of knowledge expected to replace this. From my viewpoint, the examinations are not even on a senior high school level of knowledge requirement. Second, how will this be harmonized with the US reciprocal agreement? As I understand, the US will NOT eliminate the morse code requirement, and will be a requirement for the EXTRA class licence. This means, that Canadian amateurs without the morse code requirement will be breaking the law when operating in the EXTRA class portions of the amateur bands, while operating in the US.

Even if the government eliminates morse code as a requirement, will this increase the usage of the amateur bands? Just monitor the VHF/UHF spectrum in any large city, including the greater Toronto area and you will see that unfortunately, our hobby is NOT attracting younger amateurs. Eliminating the morse code requirement is not the answer. Education and a financial support from government and the private sector is the only answer.

In short, my solution is to leave matters the way they are.

Respectfully,

# 144 - C Milley

i am in favour of keeping morse code as a requirement for amateur radio examination

# 145 - Ted Campbell

Dear Mr. Skora;

The Radio Advisory Board of Canada (Board) welcomes the opportunity to provide its comments on Canada Gazette Notice DGRB-003-04.

The Board notes that the Gazette Notice and proposal are consequences of the WRC-2003 decision to delete from the ITU International Radio Regulations the mandatory Morse proficiency requirement for a licence in the amateur service. The Conference decided to leave it to individual Administrations to determine whether or not a person seeking a licence to operate an amateur station shall demonstrate the ability to send and receive texts in Morse code signals.

This change in the regulations affects only the amateur service and therefore a decision to retain or delete the Morse examination requirement in Canada is really a matter for the amateur service and Industry Canada to resolve. The Board observes, however, that more than 25 Administrations have deleted the mandatory Morse requirement for an amateur licence, and that this follows the trend away from Morse in commercial and military services because of advances in communications technology and satellite systems such as the GMDSS. It is only natural that the Canadian amateur service now would see Morse code as continuing to be a useful and pleasurable mode of operation but no longer an essential qualification requirement. The Internet survey conducted by RABC Sponsor member Radio Amateurs of Canada indicates that this is the case.
It is understood that the proposed Canadian amateur service restructuring, changes to examination criteria and promotion of technical skills such as transmitter kit construction are measures to compensate for deleting the Morse qualification. The Board has no position on specific recommendations, but in general sees the proposed changes as progressive, enhancing personal development in accordance with the definition of the amateur service and likely to attract further candidates for the amateur service.

The Board supports the initiatives outlined in the proposal and encourages Industry Canada to work with the national amateur radio society to address and implement the recommendations.

E.R. (Ted) Campbell
General Manager
Director General
Radio communications and Broadcasting Regulatory Branch,
Industry Canada
300 Slater Street
Ottawa, Ont, K1A 0C8

Reference: “Gazette Notice DGRB-003-04”

I would like to go on record as being in favor with the recommendations made by Radio Amateurs of Canada concerning Morse code. It is good to see that Industry Canada is beginning to realize that proficiency in Morse code should not have to be the only requirement for access to the HF amateur bands below 30MHz.

Regards

John Brady

VO1CTA

[Signature]

Sept 3/04
Dear Director General,

Radio & Communications Industry Canada

Canada Gazette, Part II
REF: DGRB-003-04

I am a radio amateur in Ontario. I am in favour of your proposal to do away with Morse code as a mandatory requirement for radio amateur service.

Thanks,

[Signature]

P.S.
Comments – Gazette Notice DGRB-003-04

Note: I have paraphrased RAC’s list of recommendations.  
I am in my 70s now having been a Ham since 1981, I have instructed classes since that date both in the UK and in Canada and am now a Delegated Examiner. I do not consider myself a dinosaur but wonder about the group that put the original document together.

**Recommendation 1 – Eliminate the Morse-code Qualification**

I am in full agreement.

Knowledge of morse-code should no longer be used as a pre-requisite for access to HF. I am very active on some of the HF bands and during the last decade I have noticed a massive decline in Canadian HF activity. I would like to see this trend reversed and giving access to this part of the spectrum to all amateurs will probably help to slow down the declining rate of HF use.

**Recommendation 2 – Higher pass marks & a new Intermediate Qualification**

I disagree.

Creating another qualification designed to keep amateurs from using HF spectrum is not necessary. New amateurs who choose to use HF will adapt to this radio environment rapidly. There may be some learn as you go, but that is where the more experienced amateurs can help by example and by offering assistance.

I fail to see how eliminating the morse-code qualification changes the likelihood and impact of adverse effects to amateurs currently using HF. There have been cases of improper and inappropriate operations on HF but I think you will find that for the most part this has had to do more with the character of the persons involved than with how high of a pass mark those persons had obtained.

Dual passing marks for writing the same examination creates an “I am smarter than you” environment. Now everyone passing is treated equally and the marks are not disclosed. The new proposal would create two kinds of amateurs. Those with low marks and those with high marks. The low markers get Basic and the high markers would get Intermediate with the whole world being told on a web site. This is not appropriate.

**Recommendation 3 – Prohibit operators with only Basic Qualification from using HF**
I disagree.

We need more amateurs, especially those with an interest in emergency preparedness and trained in the use of HF. Maintaining unnecessary roadblocks to amateurs for accessing HF radio spectrum is not and has not been justified in the proposal.

**Recommendation 4 – Re-examine Basic Qualification holders with a view to obtaining 80% for obtaining an Intermediate Qualification**

I disagree.

Passing the examination should be the only evidence required for demonstrating interest in the hobby and the basic knowledge for using amateur radio equipment in any and all amateur radio bands.

**Recommendation 5 - Increase pass marks for the Basic Qualification to 70%**

I disagree.

It has not been demonstrated that entry to our hobby needs to be more difficult. We need new entrants and those sincerely interested will learn as they go.

**Recommendation 6 – Existing Basic & Advanced qualification holders be allowed to use HF. Future Advanced candidates need to obtain 70% pass mark and pre-requisite of new Intermediate qualification or Basic with Morse Code.**

I disagree.

All amateurs with the Basic qualification should be given access to HF spectrum. Additional roadblocks to access HF spectrum is unnecessary.

**Recommendation 7 – Continue Morse-code examinations for those who wish to have the qualification.**

I disagree.

When the morse-code qualification is removed from regulations, this ability does not need to be tested by the regulator. The role for recognizing morse-code ability should be with Amateur organizations.

**Recommendation 8 – Intermediate Qualification holders may construct and use commercial transmitting equipment kits**

I disagree.

I recommend that all Basic Qualification holders be allowed to construct and use commercial
transmitting equipment kits.

**Recommendation 9 — Intermediate Qualification holders be permitted to construct and use their own equipment at 2.3 GHz and above**

I disagree

I disagree with the concept of adding the proposed Intermediate Qualification.

**Recommendation 10 — New entry level qualification be introduced.**

I somewhat agree

If a new entry level qualification should be introduced, suggest that power and antenna restrictions be used to encourage new entrants to progress to Basic and Advanced.

Alternatively, perhaps the syllabus and question bank for the Basic Qualification be changed so that the examination concentrates more on regulations, operating procedures and safety issues with a lesser emphasis on technical aspects.

**Recommendation 11 — New syllabus be divided into several elements and pass mark be required on every element.**

I disagree

The syllabus and question banks should be updated and be improved. Question banks can be expanded and the negative type questions should be eliminated. However, I think the current syllabus and question banks are reasonably good for examinations. I don’t think it is necessary to break up the examination into separate parts with their own pass marks.

**Recommendation 14 — Pass marks on all elements be set at 75%**

I disagree

I am not aware of any evidence that candidates passing with a lower grade (eg. 60-74) are a problem for the amateur radio service. Higher pass marks are not necessary.

The original came from VE7AV Frank VanderZande and as I am in complete agreement with all of his comments I see no point in re-inventing the wheel by re-writing anything.

Alan Faint
October 5, 2004

Director General
Radiocommunication and Broadcasting Regulatory Branch
Industry Canada
300 Slater Street
Ottawa, Ontario
K1A OC8

Comments – Gazette Notice DGRB-003-04

Recommendation 1 – Eliminate the Morse-code Qualification

I am in full agreement.

Knowledge of Morse-code should no longer be used as a prerequisite for access to HF. I am very active on some of the HF bands and during the last decade I have noticed a massive decline in Canadian HF activity. I would like to see this trend reversed and giving access to this part of the spectrum to all amateurs will probably help to slow down the declining rate of HF use.

Recommendation 2 – Higher pass marks & a new Intermediate Qualification

I disagree.

Creating another qualification designed to keep amateurs from using HF spectrum is not necessary. New amateurs who choose to use HF will adapt to this radio environment rapidly. There may be some learning as you go, but that is where the more experienced amateurs can help by example and by offering assistance.

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Marlene Faint
VE6QS
Licensed since the 80s, first in the UK and now in Canada, I have assisted with courses in both countries.
In the Matter of

Department of Industry - Canada Gazette Notice DGRB-003-04
Volume 138, Number 35, August 28, 2004

COMMENTS

BY

DAVID C. MACKIE

regarding

RECOMMENDATIONS

from

RADIO AMATEURS OF CANADA (RAC)

to

INDUSTRY CANADA

concerning

MORSE CODE AND RELATED MATTERS
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Executive Summary

The decision made at the World Radiocommunication Conference in 2003 (WRC-2003) removed the mandatory requirement for proficiency in Morse code as a qualification for the amateur radio service. Once a jurisdiction (such as Industry Canada) eliminates the Morse code qualification, it naturally follows that all qualified amateur radio operators in that country would gain access to the HF bands.

The United Kingdom and Australia have both initiated regulatory reform to align their amateur radio services to a structure that does not require Morse code. In both of these instances all existing amateur radio operators were grandfathered to an appropriate qualification. It is noted that 18 other administrations have also removed the Morse qualification for access to HF privileges.

The Radio Amateurs of Canada (RAC) had an opportunity to develop and promote a vision for amateur radio that would embrace all amateur radio enthusiasts and legitimize the RAC’s claim that they represent the interests of all amateur radio operators in Canada. However, we are now faced with a proposal from the RAC that fails to establish an appropriate strategy for the amateur radio service. It is a proposal that serves the interests of a small minority and unjustly excludes many thousands of qualified operators from full enjoyment of the hobby.

At present there are about 32,200 amateur radio operators with High Frequency (HF) privileges. The RAC Proposal would add about 3,000 operators to these ranks (i.e. just the holders of Basic + Advanced qualifications) increasing the total to about 35,200 operators. Yet the RAC Proposal neglects almost 24,000 Basic only qualification operators, and actually reduces opportunity for these operators.

This is surprising because it is the Basic examination that tests a candidate’s suitability to operate in the HF bands (a privilege enabled when combined with the Morse code qualification). The Advanced examination exists only to test a candidate’s suitability for competently working with high power, construction of transmitters and installation of repeaters or club stations. Frankly, the Advanced qualification has nothing to do with HF band privileges.

The RAC Proposal would have Industry Canada impose new regulatory roadblocks to prevent the 24,000 Basic qualification amateur radio operators, without Morse code qualification, from accessing the HF bands. This clearly is an effort to circumvent the spirit of the WRC-2003 decision.

It is difficult to understand the reasoning for the RAC’s actions. There appears to be much left unsaid in their proposal. Certainly, justification for many of their recommendations is weak and ill considered. Therefore with considerable reluctance, the following comments are offered in response to the RAC Recommendations.
General Comments

I am the holder of a Basic qualification (VE6DCM) obtained in October 2001. The subject of Gazette Notice No. DGRB-003-04 affects my privileges as an amateur radio operator, and consequently I have an interest in the outcome of this proceeding. This qualifies me as an "interested party".

*****

Amateur radio is a hobby, and hobbies are supposed to be fun. To participate in the amateur radio service there is no more requirement than to satisfy Industry Canada of an acceptable competence. How the individual progresses in the service from that point depends on the aptitude and enthusiasm that he/she brings to the hobby.

There is no intended progression from the amateur radio service to a professional pursuit. It is not comparable to the aviation community where one can progress from an amateur as a private pilot to a professional as a commercial pilot through a unified system of examination and practical experience.

All amateur radio operators are proud of their qualifications and achievements. It is important that they be allowed to preserve these accomplishments. However, this should not be done at the expense of making the amateur radio service less inclusive to holders of junior qualifications. Every qualified operator should have the same opportunity to explore and enjoy every aspect of the hobby.

*****

The Recommendations from Radio Amateurs of Canada to Industry Canada concerning Morse Code and Related Matters (the RAC Proposal) presents 12 recommendations affecting the privileges of current and future holders of an amateur radio operating Certificate. In evaluating these proposals I have approached each with the criteria that the recommendation must be inclusive and the recommendation must be fair. Exception is taken where a recommendation has a behaviour of being exclusive or of being unsupported by substantive argument.

A number of the RAC recommendations serve to expand the privileges of operators and are inclusive in nature. In particular:

- RAC Recommendation 1 – elimination of the Morse code proficiency requirement;
- RAC Recommendation 7 – continuation of the Morse code qualification;
- RAC Recommendation 10 – establishment of a new entry-level qualification.

A number of the RAC recommendations are just the opposite. They seek to exclude or limit the privileges of operators and lack appropriate fair treatment to qualified operators. In particular:

- RAC Recommendation 2 – sets an unreasonable pass mark for the Basic examination;
- RAC Recommendation 3 – exclusion of HF privileges from operators who have not obtained a Morse code qualification;
• RAC Recommendation 4 – exclusion of HF privileges unless qualified operators submit to being retested to a new standard;
• RAC Recommendation 6 – exclusion of a path to obtain the Advanced qualification by current Basic qualification operators;

RAC Recommendations 2, 4, 5, 6, 11 and 12 in one way or another deals with a policy issue of raising the pass mark for examinations. I am in support of an adjustment to the pass mark if it serves the community by establishing an appropriate evaluation of a candidate’s ability to operate safely and competently. I am not in support of an adjustment to the pass mark if its fundamental purpose is to restrict access to the amateur radio service by Canadians.

RAC Recommendations 8 and 9 deal with the transfer of privilege to construct transmitter equipment from the Advance qualification to the Basic / Intermediate qualification. These recommendations may require substantive transfer of material from the Advanced to Basic / Intermediate syllabi.

The RAC Proposal includes reference to the development of a new syllabus. Since there is no direct implication to the privileges of new or existing operators in the RAC Proposal there is no need to comment here on the merits of that initiative.

There is fair argument for the establishment of three (3) Certificate Qualifications reflecting different levels of competence and privileges. However, the RAC Proposal provides for 4 license classes (entry-level, Basic, Intermediate, and Advanced); but only 3 available on a going forward basis (entry-level, Intermediate, and Advanced) once new syllabi and examinations are established. The Basic qualification would continue only as an orphaned qualification with frozen privileges.

A review of the amateur call sign database (obtained from the RAC website at ftp://ftp.rac.ca/pub/cdncaldb.zip on September 20, 2004 with 59,088 listings) indicates that there are about:

<table>
<thead>
<tr>
<th>Qualification</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic qualification operators</td>
<td>23,860</td>
</tr>
<tr>
<td>Basic + Advanced qualification operators</td>
<td>3,009</td>
</tr>
<tr>
<td>Basic + Morse code qualification operators</td>
<td>5,560</td>
</tr>
<tr>
<td>Basic + Advanced + Morse code qualification operators</td>
<td>26,659</td>
</tr>
</tbody>
</table>

It would appear that the RAC Proposal would grandfather 8,569 operators with Basic + Advanced and Basic + Morse to the new Advanced or the new Intermediate qualifications. However, those operators with Basic + Morse code currently have full HF privileges and consequently gain nothing. It is just the 3,009 Basic + Advanced qualification operators which benefit from the RAC Proposal by acquiring HF privileges not currently enjoyed.

It would also appear that the RAC Proposal would not provide any benefit to the 23,860 Basic only qualification operators. The RAC Proposal entrenches the Basic qualification as the only qualification without HF privileges and will isolate 40% of all qualified operators for decades to come.
It is entirely possible that many existing Basic qualification operators may seek a future entry-level qualification to acquire some HF privileges. This would be a truly embarrassing regulatory twist.

*****

It is unfortunate that the Gazette Notice as well as Mr. Daniel Lamoureux’s letter of July 20 2004 to Mr. Jan Skora, downplayed the consequences of the RAC Proposal. Both of these documents should have clearly brought to the reader’s attention that there would be significant numbers of amateur radio operators left without HF privileges. This matter is central to the RAC Proposal and it should have been expressed in the clearest of terms.

The RAC Proposal reads with the intent to add complexity to the operator classes, to limit grandfathering of qualified operators, to limit access to bands, to require the retesting of operators, and to extend privileges without merit. It is regrettable that the RAC Proposal serves the interests of a select few in their enjoyment of amateur radio at the exclusion of so many others.

The RAC Proposal is complex to explain to the average amateur radio operator, it will be complex and costly to implement, and it does not satisfy fundamental issues of fairness, inclusion and expansion of the amateur radio service to all Canadians.
Recommendations

It is requested that Industry Canada approve RAC Recommendations 1, 5, 7 and 10.

Industry Canada should disapprove RAC Recommendations 2, 3, 4, 6, 8, 9, and 11.

Industry Canada should consider proceeding on a modified basis for RAC Recommendation 12.

*****

To ensure the health of the Amateur Radio Service, Industry Canada should extend HF privileges to all current Certificate holders.

Industry Canada should establish a new “entry-level” or “Restricted” qualification, which will carry HF privileges at reduced power, as the initial qualification for all future amateur radio operators.

Industry Canada should establish a single pass mark for the Basic / Intermediate and Advanced examinations of 70%.

*****

Should Industry Canada accept the recommendations in the RAC proposal, and does not extend HF privileges to the Basic qualification, then there should be a reasonable grace period for amateur radio operators to select an appropriate upgrade path. This could be:

- by rewriting the Basic examination,
- by acquiring the Morse code qualification, or
- by acquiring the Advanced qualification.

This grace period should provide for at least a year, or longer if implementation of the proposed Intermediate examination were delayed.

Industry Canada would have a duty to inform each Basic only operator of the grace period and of the options available for upgrading. Industry Canada should also provide explicit reasons as to why a previous pass on the Basic examination is now considered inadequate for this purpose.
RAC Recommendation 1

Radio Amateurs of Canada recommends to Industry Canada that the current Morse code Qualification be dropped as a requirement for operation in the bands below 30 MHz.

Comment on Recommendation 1

I support this recommendation as it is in keeping with the WRC-2003 decision to remove the mandatory requirement for proficiency in Morse code as a qualification for the amateur radio service.

*****

It is not necessary for Industry Canada to consider any other factors regarding this recommendation. The decision to remove the mandatory requirement for proficiency in Morse code for the amateur radio service and to extend HF privileges to all Certificate holders can stand on its own.

Once Morse code proficiency as a precondition for HF privileges is removed, Industry Canada should revise:

- The Radiocommunication Regulation as appropriate to remove reference to Morse code;
- RIC-2 Schedule I (and Schedule II and III as appropriate) to delete in “Column IV Operator Qualification” the requirement for Morse code qualification; and
- RIC-3 Section 1.3 to extend access to all amateur bands to both Basic and Advanced qualification holders.

This will automatically extend HF privileges to all holders of the Basic qualification.

There would be no ensuing administrative cost to Industry Canada or disruption to the amateur radio operator community.

Any manipulation of the qualifications for HF privileges, beyond the removal of the mandatory requirement for proficiency in Morse code, must serve a legitimate purpose aligned with the goals of Industry Canada.

From RIC-3 in the Forward these goals are expressed as:

"The Department of Industry believes that amateur radio should be readily accessible to Canadians, so that those who are interested in the science and art of radiocommunication may avail themselves of every reasonable opportunity to learn, enjoy, contribute or participate in this service. The necessity for operators to have some technical and operating knowledge before being allowed access to amateur radio bands is a well established and internationally recognized principle."

RAC Recommendations 2, 3, 4, and 6 are in conflict the Industry Canada goals. These recommendations, however well intended, will not promote the health of amateur radio in Canada.
RAC Recommendation 2

RAC recommends to Industry Canada that, at the same time as Recommendation 1 comes into force, the achievement of a grade of at least 80% on the Basic examination will be required in order to be permitted to operate in the bands below 30 MHz. Achievement of at least 80% will lead to a new qualification to be called the Intermediate Qualification. Holders of the present Basic plus Morse Qualification will be deemed to hold the Intermediate Qualification.

Comment on Recommendation 2

I do not support this recommendation.

All current holders of the Basic qualification have met the technical, regulatory and operating knowledge requirements set by Industry Canada to operate in the HF bands. It is not appropriate to retroactively deem this qualification to be unfit to operate in the HF bands.

A practice of retroactive legislation, or regulation, is undertaken by government only in extreme situations and for the preservation of the public good and stabilization of society. It is not a practice to be undertaken for issues of lesser concern, such as the amateur radio service.

Industry Canada runs the risk of setting a non-binding precedent that, at some time in the future and for a different issue, could place the department in an uncomfortable position.

*****

This recommendation extends to current holders of the Basic + Morse qualifications an automatic grandfathering to the Intermediate qualification. This action achieves a simplification of the licensing formula and can be supported.

This recommendation sets a pass mark of 80% for the Basic examination for which there was no empirical evidence presented by the RAC. The effect will be to drastically reduce the number of candidates that would obtain an Intermediate qualification and consequently HF privileges. This will essentially stall the growth of the amateur radio service in Canada.

*****

The RAC Proposal includes the following two quotes:

Operation in the HF bands requires technical competence on the part of radio amateurs, as well as a good knowledge of international regulations and operating practices. (RAC Proposal p. 8)

Industry Canada published a revised Basic syllabus in RIC-3 in 2001, replacing the previous syllabus appearing in RIC-24, last issued in 1997. Inspection of this revised syllabus will reveal that it is quite comprehensive of the topics relevant to HF operation, although some topics, such as modern digital modes, should be added. It is closely equivalent to the US General syllabus and the UK Intermediate syllabus which carry HF privileges. An examination based on this
syllabus, taken in conjunction with our recommended increase in pass mark
discussed below, is therefore an adequate test for the proposed new Intermediate
Qualification. (RAC Proposal p. 15)

From the first quote above, the RAC’s expression of “technical competence” and “a good
knowledge” and Industry Canada’s expression of “some technical and operating knowledge”
(RIC-3 Forward) reveals that the RAC is perceiving a standard for qualification which does not
exist. The RAC is attempting to introduce a higher competency requirement than that deemed
appropriate by Industry Canada.

The second quote above indicates that the RIC-3 syllabus used for the Basic qualification
examination is equivalent to the syllabus used for HF privileges in the USA and the UK.
Accordingly, the Basic qualification examination itself is deemed acceptable for the granting of
HF privileges. This is the position taken by Industry Canada for its granting of HF privileges
when combined with the Morse code qualification.

The examination for Morse code proficiency is in a simulated setting, i.e. not on the air, and does
not include any component that could be deemed to test a candidate’s competence to operate in
the HF bands.

It is difficult to see a valid argument that existing holders of the Basic qualification lack adequate
qualification to transmit in the HF bands.

*****

The foundation of the RAC’s Recommendation 2 is that there must be a higher pass mark in
place to pass the Basic examination and obtain HF privileges. The RAC Proposal provides only
the sketchiest of evidence in support of this position. They note:

Based upon the experience of two members of the Committee as amateur radio
course instructors (and one as an Accredited Examiner), and taking into account
statistics relating to grades obtained on the Basic examination, as well as a
mathematical analysis of the examination process (see Appendix 2), it has been
concluded that the current Basic examination with a pass mark of 60% allows
some persons to obtain that qualification without having an adequate knowledge
of regulations, operating practices and radio theory. For this reason RAC
believes that a change in the Basic examination pass mark should be implemented
at the same time as the proposed elimination of the code requirement. (RAC
Proposal p. 9)

The RAC has not provided evidence in support of abuse of the examination process whereby a
material number of individuals have wrongly obtained a Basic qualification. Granted the
probability for a marginal student to pass the examination does exist, but this is an attribute of
the existing 60% pass mark and the nature of multiple-choice tests.

The RAC has not provided evidence in support of setting the pass mark at the 80% level. In fact,
the chart “Probability of Passing Multiple Choice Exam” (RAC Proposal, page 17) presents
statistics for only 60% and 70% pass marks, with and without guessing. For a candidate with half-knowledge, with guessing:
- using a 60% pass mark the candidate should pass the examination 73% of the time;
- using a 70% pass mark this same student should pass the same examination only 5% of the time.

To set the pass mark at 80% would only serve to drive down the probability of this half-knowledge student passing from 5% to zero. It would appear that there is no purpose served by raising the pass mark to 80%.

In addition, the RAC has not demonstrated that the existing Basic qualification with the existing pass mark of 60% fails to meet the objectives of Industry Canada.

****

The corollary of the RAC argument is that those operators who obtained test score of less than 80% should have been failed and not granted a Certificate. In essence the 60% pass mark should never have been allowed.

To accept the RAC’s argument Industry Canada is obligated to suspend all operating privileges of all holders of the Basic qualification who obtained a low pass mark. Should these operators wish to continue with the amateur radio service they would be retested under a new standard.

This argument brings the existing examination process into disrepute and consequently may be considered by other jurisdictions to be materially flawed. It potentially could jeopardize reciprocal operating privileges with other countries.

****

I am concerned that the RAC is attempting to “raise the bar” and thereby arbitrary limit the number of operators which may operate in the HF bands. In their proposal they commented:

“The bandwidth factor would come into play, as well, if the Morse code requirement is dropped. It is likely that an increased number of radio amateurs will commence to make use of the HF bands for single sideband communication. This will add pressure to the sub-bands now recommended by RAC for such transmissions.” (The Role of Morse Code, page 7)

Whether active operators saturate the HF bands is not germane to the matter of granting HF privileges upon the removal of the Morse code qualification requirements.

The RAC Recommendation 2 has the effect of reinstituting a filter previously served by the mandatory requirement for Morse code proficiency that limited the number of Canadian operators in the HF bands. To accept this recommendation Industry Canada will by inference be endorsing a practice of restricting the HF bands to a elite subset of the amateur radio operator community.
I consider it highly unlikely that droves of existing Basic qualification operators will seize the day and purchase new rigs, erect towers, and run kilometers of long wires to capitalize on new HF privileges. It is much more likely that the adoption of HF privileges will be gradual as operators feel they can afford the investment.

In any regard, the number of potential operators in Canada is dwarfed by the existing presence of American operators in the HF bands.

If there is a legitimate concern regarding the transition of Basic qualification operators to the HF bands then it can be dealt with by Industry Canada by imposing a transmitter power limitation. It may be reasonable to limit these new HF operators to a maximum of 10 watts PEP operation for a period of time. For example, low power or QRP operation would be permitted through December 31, 2006, after which the operator may go to the full power allowed by his/her qualification.

*****

Regardless of the historical testing process for the Basic qualification and whether some individuals have or have not mastered the body of knowledge, the Basic qualification should be recognized as the expected qualification for operators engaged in most aspects of amateur radio.

All existing holders of the Basic qualification should be treated equally. All holders of Basic, Basic + Morse and Basic + Advanced should be extended the same privilege of operating in the HF band. It is not reasonable to fragment the radio amateur service into different classes based on an unproven assumption regarding inadequacy of the examination process.
RAC Recommendation 3

RAC recommends to Industry Canada that current holders of the Basic Qualification who have not also obtained the Morse Qualification should continue to have their existing operating privileges. That is, they will be permitted only to operate on the bands above 30 MHz.

Comment on Recommendation 3

I do not support this recommendation.

All current holders of the Basic qualification have met the technical, regulatory and operating knowledge requirements set by Industry Canada to operate in the HF bands. It is not appropriate to retroactively deem this qualification to be unfit to operate in the HF bands.

****

The RAC’s justification of this recommendation is that:

"Most existing holders of the Basic Qualification (without the Morse code Qualification) will not have real experience of the technical, regulatory and operating requirements referred to above. In most cases, they will not be well-prepared to operate in the HF bands." (RAC Proposal p. 8)

There are two flaws in this argument. First, many Basic + Morse qualification operators will have obtained a test score on the Basic examination in the range of 60 to 79%. These operators have not demonstrated a superior understanding of the technical, regulatory and operating requirements on the Basic examination. And as such, have not proved that they are better prepared to operate in the HF bands.

Second, there is no regulatory requirement for operators to have “real experience” or, to be able to demonstrate having acquired experience, prior to commencing to operate in any particular band.

The Basic + Morse operator may begin using phone and data modes in the HF bands from day one upon receiving his / her Certificate. He / she may chose to never operate using Morse code and to never make a single contact using Morse code.

It does not logically follow that a current operator with Basic + Morse qualification has any better preparation than an operator with just Basic qualification for phone or data transmission in the HF bands. An implication that Morse code proficiency has by some unspecified attribute imbued the operator with the technical, regulatory and operating skills necessary of operate on the HF bands is unsupported.
RAC Recommendation 4

RAC recommends to Industry Canada that any current holder of the Basic Qualification who does not also have the Morse Qualification should have the option of re-taking the Basic examination with a view to obtaining a grade of at least 80%. Those who are successful will receive the Intermediate Qualification.

Comment on Recommendation 4

I do not support this recommendation.

All current holders of the Basic qualification have met the technical, regulatory and operating knowledge requirements set by Industry Canada to operate in the HF bands. It is not appropriate to retroactively deem this qualification to be unfit to operate in the HF bands.

*****

The RAC Proposal fails to recognize the accomplishments of those individuals who studied hard, and who fairly passed the Basic examination. By suggesting that all current Basic qualification holders "have the option of re-taking the Basic examination" this Recommendation has the effect of nullifying the test score originally obtained by candidates on the Basic examination. This rewriting of history would relegate all Basic only qualification holders to an inferior status within the amateur radio service.

For Industry Canada to accept the arguments of the RAC, it must be absolutely certain that there is sufficient merit to abrogate the rights of existing Basic qualification operators. It is considered that this would require substantively superior evidence that that put forward by the RAC. In addition, there is a duty on Industry Canada to explain it’s reasoning to the amateur radio community and to society at large.

Further, it marginalizes the expectation held important by all Canadians that the Government of Canada will extend fair treatment to its citizens. There is no precedent in Canadian history that would require the retesting of thousands of Canadians to preserve an existing privilege.

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In their consideration of the revised syllabi for the different license classes the RAC commented:

"The Entry and Intermediate syllabi would be derived from the present Basic syllabus and the Advanced syllabus would be substantially unchanged." (RAC Proposal p. 13, 14)

It is clear that the current Basic syllabus includes the two proposed qualifications, entry-level and Intermediate. The RAC Proposal does not enlighten us as to which subjects the Intermediate examination would cover that are not already covered by the current Basic examination. There is no evidence presented in the RAC Proposal that leads to the conclusion that the current Basic examination does not include subject matter, or specific test questions, which would be necessary for a candidate to demonstrate competence and acquire HF privileges.

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The RAC survey results indicate that a majority of respondents "... believe that the Basic examination should be more rigorous." (RAC Proposal p. 7) Perhaps on a going forward basis this may be appropriate.

The RAC has not provided any evidence as to there being majority support within the radio operator community to require existing Basic qualification holders to meet a new standard upon removal of the Morse code proficiency prior to gaining HF privileges. If the question had been posed in their Internet based survey, I suspect they would have received a very poor response.

It is not appropriate to require the retesting of candidates who have met the qualification requirements set by Industry Canada. To do so would place an unfair burden on many qualified operators to revisit the study materials (potentially to purchase new study materials), to sit the examination again, and to pay an examination fee again.

The selection of an 80% pass mark is purely arbitrary and is not supported by valid arguments made by the RAC. At best the RAC has supported an argument for a pass mark of 70% in their comments regarding RAC Recommendation 12.

If Industry Canada is persuaded to accept RAC Recommendation 4, the pass mark should be set no higher that the ultimate pass mark that Industry Canada intends to use on a going forward basis. Please refer to the section "Comment on Recommendation 12".

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At the very least, the RAC Proposal places an administrative duty on Industry Canada to review its records and determine which holders of Basic qualification did originally receive a test score of at least 70% or 80%. Those operators should by default meet the criteria of RAC Recommendation 4 and should be automatically grandfathered to an Intermediate qualification.

There is a material problem should Industry Canada not have complete records of the pass mark of every holder of a Basic qualification. If Industry Canada can not determine which Basic qualified operators earned a test score of at least 70% or 80%, then Industry Canada has a duty to automatically grandfather all Basic qualification operators to the new Intermediate qualification.
RAC Recommendation 5

RAC recommends to Industry Canada that the pass mark for the examination leading to the Basic Qualification be raised to 70% at the same time as the Morse code requirement is eliminated.

Comment on Recommendation 5

I support this recommendation.

A higher pass mark will make the process of becoming an amateur radio operator more difficult and may discourage individuals from the hobby who perhaps do not do well in a testing situation. However, I do not consider that the bar has been unreasonably raised.

The RAC Proposal envisions a pass mark of 70% or 80% for the current Basic examination. With a 70% pass mark the candidate does not acquire HF privileges; and with an 80% pass mark the candidate is granted HF privileges. The RAC has not supported an argument whereby a 10% lower score on the same examination justifies not granting HF privileges.

As a matter of policy, there should be only one pass mark for any examination.

If Industry Canada is persuaded to accept RAC Recommendation 5, the pass mark should be set no higher that the ultimate pass mark that Industry Canada intends to use on a going forward basis. Please refer to the section “Comment on Recommendation 12”.
RAC Recommendation 6

RAC recommends to Industry Canada that all persons who currently hold both the Basic and Advanced Qualifications be given operating privileges on the HF bands. In future, persons who wish to obtain the Advanced Qualification should already hold the Intermediate Qualification, or the current Basic plus Morse Qualifications, and will need to obtain a grade of at least 70% on the Advanced examination.

Comment on Recommendation 6

I do not support recommendation 6 as it seeks to exclude all current Basic only qualification operators from attempting to acquire an Advanced qualification. All future candidates would be required to hold an Intermediate qualification.

This recommendation extends to current holders of the Basic + Advanced qualifications an automatic grandfathering for access to the HF bands. The aspect as to whether or not an operator has an Advanced qualification should be immaterial to whether or not HF privileges should be granted. The Advanced examination is not intended to demonstrate mastery of a body of knowledge necessary in order to operate on the HF bands.

It has not been a prior requirement that the examinations be passed in any particular order; however it has been a requirement that an individual must have the Basic qualification prior to getting on the air. Yet to require a junior qualification (i.e. the Basic / Intermediate qualification) prior to proceeding with a more senior qualification (i.e. the Advanced qualification) appears to be a natural progression. It is reasonable for Industry Canada to require candidates to progress from one qualification to another.

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The RAC Proposal does not provide any evidence to support the assertion that a holder of a Basic qualification does not merit the opportunity to proceed to the Advanced qualification.

There are currently some 3,000 individuals who have acquired the Basic + Advanced only qualification. These individuals sought to acquire privileges to use high power, to construct and operate transmitters, to install "repeaters", or to install "club stations". While limited to the VHF and above bands these individuals have demonstrated that this license path is appropriate for their amateur radio pursuits. Given that RAC Recommendation 3 would limit a Basic qualification operator to activities in the VHF and above bands there is no apparent reason why RAC Recommendation 6 should close the door on these operators seeking an Advanced qualification.

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Justification for RAC Recommendation 6 rests on the premise that individuals attempting the Advanced examination did originally pass the Basic examination with a superior score. There is no evidence presented that this is the case and there may be argument that the reverse could be true. The RAC Proposal uses two conflicting positions that bring into serious question this justification.
First, the RAC Proposal provides for operators with an Advanced qualification to be granted HF privileges, regardless of the individual test score obtained on the Basic examination. They commented:

*In fact, such persons are likely to have passed the Basic examination with a high grade and should have reasonable technical competence. In view of Recommendation 2 it seems acceptable and fair to allow such persons to have access to the HF bands.* (RAC Proposal p. 9)

There is no empirical evidence presented that a majority, or at least a significant number, of these operators obtained a test score of at least 80% on the Basic examination (the proposed standard) and consequently there is no foundation to this assertion.

Second, the discussion of examination scores supporting RAC Recommendation 11 highlighted a concern that "technically trained" individuals could pass the Basic examination without adequate mastery of regulations. It is reasonable to assume that many candidates for the Advanced examination would have more technical training than the general population. It is possible that there are current holders of an Advanced qualification which due to their technical ability were able to pass the Basic examination with a minimal understanding of the regulations. The RAC argued that:

*Only 25 percent of the (Basic) examination is based on regulations and a mastery of the other areas only - operating and theory - will produce a pass. In fact, it is quite possible for a candidate who is technically trained to pass the examination without studying regulations at all.* (RAC Proposal p. 15)

We must not lose sight of the fact that it is the Basic examination which determines fitness for operation in the HF bands, not the Advanced examination. The merits of extending HF privileges to holders of the Advanced qualification based solely on an unsupported assumption that these persons have demonstrated a superior mastery of the Basic examination syllabus is completely unfounded.

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To make the RAC Proposal work it was obviously necessary to close the future option for Basic qualification holders to seek an Advanced qualification. To leave this door open would allow Basic qualification holders to acquire HF privileges by passing the Advanced examination. By closing this door there is no opportunity for current Basic qualification holders to acquire HF privileges except by meeting a new examination standard.

This has nothing to do with whether these persons legally merit seeking the Advanced qualification, and everything to do with the aspect that these persons should be prevented from acquiring HF privileges by passing the Advanced examination. RAC Recommendation 6 is both unduly complex in its operation and morally objectionable.

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If Industry Canada is persuaded to accept RAC Recommendation 6, the pass mark should be set no higher that the ultimate pass mark that Industry Canada intends to use on a going forward basis. Please refer to the section “Comment on Recommendation 12”.
RAC Recommendation 7

RAC recommends to Industry Canada that the present Morse code examination continue to be available to those Canadian radio amateurs who wish to have that qualification specified on their certificate.

Comment on Recommendation 7

I support this recommendation.

To protect reciprocal rights with other countries all operators should have the option of being tested for Morse code proficiency and to have this proficiency detailed on his / her license.

Any existing or new operator with a Basic or Intermediate qualification should be eligible to take the Morse code examination.

It follows that RAC Recommendation 2 is in conflict with RAC Recommendation 7, in future situations, where a Basic qualification operator acquires the Morse qualification. RAC Recommendation 2 does not provide for future Basic + Morse qualification operators being eligible for upgrading to the Intermediate qualification and HF privileges.
RAC Recommendation 8

RAC recommends to Industry Canada that holders of the Intermediate Qualification be permitted to construct and use commercial transmitting equipment kits.

Comment on Recommendation 8

I do not support this recommendation.

This recommendation will materially reduce the attractiveness of obtaining an Advanced qualification.

Individuals with an interest in constructing and using commercial transmitting equipment kits should be required to seek an Advanced qualification. It is appropriate to require an understanding of electronics theory prior to engaging in the construction of a transmitter.

At this time the Basic / Intermediate examination does not adequately test a candidates’ knowledge of electrical theory to merit the granting of this privilege. The RAC Proposal does not foresee the transfer of appropriate sections from the Advanced examination to the Basic / Intermediate examination.

From RIC-3 Section 1.3 p.3, the Basic qualification permits the amateur to:

"build and operate all station equipment, except for "home-made" transmitters"

Basic qualification permits the amateur to construct all other station equipment connected to the radio station. It is considered that there is ample opportunity for the amateur operator to construct other commercial kits, or to design and construct station equipment without using a kit. However, the transmitter is a critical component of the radio station.

It is conceded that the construction of a commercial kit, will in most cases, result in a finely built and properly functioning transmitter. In instances where the kit is not assembled properly there may be concern as to whether the Basic / Intermediate qualified operator is competent to correct the mistake.

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Should a Basic / Intermediate qualification operator wish to construct commercial transmitting equipment kits he / she may of course do so. The regulations only require that an individual with an Advanced qualification "install or operate" the transmitter. This may be inconvenient to the builder, but he / she may build the kit. Perhaps after building the kit the amateur would attempt the Advanced examination.
RAC Recommendation 9

RAC recommends to Industry Canada that holders of the Intermediate Qualification be permitted to construct and use their own transmitting equipment in the bands at 2.3 GHz and above.

Comment on Recommendation 9

I do not support this recommendation.

This recommendation will materially reduce the attractiveness of obtaining an Advanced qualification.

Individuals with an interest in the design of radio circuitry and constructing transmitting equipment, regardless of the band or frequency, should be required to seek an Advanced qualification.

The Basic / Intermediate qualification process is not the appropriate place to determine whether an individual can competently design and construct transmitting equipment.

There is substantial commercial interest in these frequencies and amateur operations are a secondary service in most of these bands. This places an increased duty of care upon the amateur to not cause interference to stations licensed in other services.
RAC Recommendation 10

RAC recommends that a new entry-level qualification be introduced, designed to ensure good operating practices and requiring only an introductory level of theory.

Comment on Recommendation 10

I support this recommendation.

This is a tremendous opportunity to expand the universality of access to amateur radio. The hobby must become as accessible as other pursuits undertaken by Canadians for it to grow and successfully position itself in our modern world.

The UK Foundation License provides an excellent model for our consideration. To obtain a Foundation License the candidate attends a 10-hour course and answers a 25 multiple choice question test where 18 must be answered correctly (72% pass mark). The course focuses on safety, avoiding interference and good operating practice. The Foundation License permits the operator to use a transceiver capable of 10 watts delivered to the antenna and operation in the bands between 135.7 kHz and 440 MHz, except for the 10 m band and just 1 watt in the 135.7 kHz band.

As of November 2003, there were 4675 Foundation License holders in the UK. 1204 of these were under the age of 21. (Radio Society of Great Britain statistic)

It is suggested that an entry-level qualification be referred to as the “Restricted qualification”. The use of the word “restricted” will reinforce in the mind of the operator that his/her privileges are considered entry-level and are substantively limited. The term is also used on radiotelephone licenses for marine and aviation applications.

Careful consideration must be given to this qualification to ensure that it is used as a launching point for the operator to progress to the Basic / Intermediate qualification. Consequently, the qualification should be designed with ample opportunity to explore amateur radio, but with material limitations. The RAC Proposal was silent on many aspects of an entry-level / Restricted qualification, accordingly the following privileges are provided as a foundation for discussion.

An operator with a Restricted qualification would be allowed to:

- obtain and hold one (1) call sign from one (1) region;
- operate only within the geographic boundaries of his/her call sign prefix;
- transmit using a maximum of 10 watts PEP;
- operate in all bands from 160 m through 70 cm, and eligible to use AM, FM, SSB, and CW modes.
The operator with a Restricted qualification would not be allowed to:
- operate outside his / her call sign prefix region, or outside of Canada;
- transmit with more than 10 watts power, except when a qualified operator is in attendance;
- transmit using digital modes.

The restrictions are intended to provide incentive for the operator to proceed to the Basic / Intermediate qualification. In particular:
- By operating only in the call sign prefix region the operator is disadvantaged by not having the freedom of movement enjoyed with a higher class Certificate.
- By operating only in the call sign prefix region and prevented from operating outside of Canada, Industry Canada may structure the Restricted qualification syllabus with reduced consideration of regulations regarding operation outside of Canada, and consequently not be concerned as to whether these operators have adequate proficiency to operate in a foreign jurisdiction. The issue of negotiating reciprocal privileges is also avoided.
- A limitation of 10 watts PEP avoids the need for RF safety issues in the syllabus, and would limit the occurrence of interference and exposure to EMR. The novice operator may develop skills without fear of causing significant disruption to other operators.
- The RAC Proposal contemplates including digital communication modes in the Intermediate syllabus.

By allowing an operator with a Restricted qualification to immediately operate on the HF bands, with low power, it is presumed that the operator will develop operating and technical skills to offset the limitation imposed by the power restriction. This would put many new operators on the same footing as those from an earlier time, such as the 1950s or 1960s, when many transmitters were of low power. It would also avoid a situation where an operator with underdeveloped skills reaches too far a field with his / her radio signals.

I would suggest that the process for obtaining a Restricted qualification be equivalent to that of obtaining a Pleasure Craft Operator’s Card. There should be a simplified study manual and a comprehensive test with a 75% pass mark requirement with 36 questions. The study materials and test would be available from local registry offices and conducted in the same manner as that for the Pleasure Craft Operator’s Card.

Some operators may be content to enjoy an entry level / Restricted qualification for their entire experience with amateur radio. There is certainly room for them within the community.
RAC Recommendation 11

RAC recommends that all examinations on the new syllabus be divided into several elements, as appropriate, and a pass mark be required on every element.

Comment on Recommendation 11

I do not support this recommendation.

The initiative for a multipart examination is based on a perception that some candidates may be able to achieve a pass mark without adequate understanding on all aspects of the subject matter. There may be a mathematical probability of this circumstance, however the RAC Proposal does not provide empirical evidence that it has occurred in a material number of cases.

By significantly raising the pass mark, to 70% or 75%, there is by default minimal need to compartmentalize the examination into elements. The higher pass mark becomes more inclusive of those sections of the examination where a candidate may resort to guessing. It will effectively discourage a strategy of guessing at a whole section of an examination.

In any regard, the entry-level / Restricted qualification should be a single element examination. By setting a 75% pass mark and having just 36 questions there is no practical advantage to structuring this test as a multi element examination.

If the entry-level / Restricted examination is patterned with 12 questions each for the Technical, Operations and Regulation subjects it is not possible to pass with fewer that 3 correct answers in any 1 subject. \((12 + 12 + 3) = 27\) Various candidates will have an aptitude for different aspects of the syllabus. Some will master technical sections more easily; other may master the regulations more easily. Regardless, amateur radio is a pursuit of exploration and self-study where the examination is merely the first step of many.

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The RAC proposed that the full examination would have to be retaken if part of the examination was failed.

"It is not feasible to administer the record-keeping for part-credits on a two- or three-part examination; it would be necessary, from a practical standpoint, to require the candidate to pass all parts at one sitting." (RAC Proposal p. 17)

The practice of rewriting an entire examination introduces a degree of unfairness by requiring the candidate to reattempt successfully passed elements. There will be unfortunate cases where a candidate passed an element on the first attempt but failed the same element on the second attempt. Whether the candidate makes a third attempt would perhaps be somewhat dubious as he / she becomes bounced about in examination purgatory.
RAC Recommendation 12

RAC recommends to Industry Canada that the pass mark on all elements of all examinations be set at 75 percent at the same time as the new syllabi are introduced.

Comment on Recommendation 12

I support the intention of the recommendation to raise the pass mark, but not necessarily to the 75% level. A pass mark of 70% should be adequate for the purposes of establishing a fair testing programme.

Should Industry Canada consider it necessary to set a new pass mark for examinations, the initiative should be undertaken once and just once. The new pass mark would apply for all purposes contemplated in the RAC Proposal. This will avoid the inevitable confusion resulting from having passed an examination with a particular score (60, 70, 75, or 80%) at a particular point in time.

The purpose of changing the pass mark should only be for the purpose of satisfying Industry Canada that the candidate has an adequate level of knowledge to safely and competently operate a radio station pursuant to the conditions of his / her Certificate. The amateur radio service is after all a hobby, and not a programme of study leading to professional activities.

Within the University community a grade of 72 to 75% generally equates to a grade point average of 3.0 or “B”. This is generally the minimum grade obtained during undergraduate study acceptable for admission to graduate studies. A grade point average of 2.0 or “C” generally equates to a percentage equivalency of 60 to 63% and is the minimum considered acceptable for advancement to a higher-level course. The adoption of a pass mark above 70% is an indication of having met a high standard.

The RAC has presented arguments that there is reasonable potential for a candidate to pass an examination and yet have as little as 50% understanding of the material. If this is acceptable to Industry Canada then there should be no change to the existing 60% pass mark.

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With respect to the RAC’s chart “Probability of Passing Multiple Choice Exam” on page 17 of their proposal, for a pass mark set at “60% with guessing”,

A closer examination of the probabilities ... shows that this half-knowledge candidate will pass an examination 73 percent of the time. (RAC Proposal p.16)

The same chart indicates that a pass mark set at “70% with guessing” this half-knowledge student will pass the examination only 5% of the time.

In addition, from the same chart with a pass mark set at “70% with guessing” it would appear that a candidate with a mastery of 70% of the material would pass the examination 95% of the time. In my mind this is acceptable.