

**Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

In the Matter of:)	RM-10781 (Ex-parte)
)	RM-10782 (Ex-parte)
)	RM-10783 (Ex-parte)
)	RM-10784 (Ex-parte)
)	RM-10785 (Ex-parte)
Amendment of Part 97 of the Commission's)	RM-10786 (Ex-parte)
Rules as they relate to the requirement of)	RM-10787 (Ex-parte)
Morse code in the Amateur Radio Service.)	RM-10805
)	RM-10806
)	RM-10807
)	RM-10808
)	RM-10809
)	RM-10810
)	RM-10811

COMMENTS OF REC NETWORKS

REC Networks ("REC") is a supporter of locally owned and diverse radio. REC currently operates several Internet only radio stations. REC also operates several websites including the original LPFM Channel Search Tool¹. REC Networks also represents the interests of independently owned Low Power FM ("LPFM") broadcast stations and their listeners. REC also follows issues that involve the availability of media in rural and underserved areas.

REC considers the ability to send and receive Morse code in the Amateur Radio Service as an operating skill just as the operation of a station in the Amateur-Satellite service or the operation of various modes such as Amateur Television (ATV) or Earth-Moon-Earth (EME).

Even though not every amateur licensee would ever operate some of these modes, they are questioned about these modes on the written examination.

¹ - <http://www.recnet.com/lpfminfo>

REC feels that amateurs should be required to take a 5 word per minute (WPM) Morse Code requirement for the General Class license. No additional code test would be required for the Amateur-Extra class license. Therefore, we feel that those who hold a Technician license should be give phone privileges to 28.3-28.5 MHz as well as CW privileges in the Novice sub-bands.

Retention of the code in the examinations for the higher license classes will maintain a level of incentive to upgrade. We feel that the placement of the 5WPM code requirement at the General class is the most appropriate.

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