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**TELECOMMUNICATIONS REGULATORY COMMISSION
OF SRI LANKA**



Consultation on

Reducing the Speed of Morse Code Proficiency Requirement for High Frequency (HF) Access by Amateur Radio Licensees

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CONSULTATION ON REDUCING THE SPEED OF MORSE CODE PROFICIENCY REQUIREMENT FOR HIGH FREQUENCY (HF) ACCESS BY AMATEUR RADIO LICENSEES.

1. Introduction

The Amateur Radio Licences are issued in Sri Lanka after a theory and practical Morse Code test conducted by Telecommunications Regulatory Commission (TRC).

The categories of Amateur licences are Novice (B), Novice (A), General and Advance. The General and Advance class licensees have authority to access all HF Amateur frequency bands where Novice (A) can access only few HF frequency bands and Novice (B) Licensees are not authorised to access any HF Amateur frequency band.

TRC has received several requests from Amateur licence holders as well as other interested parties to reduce the speed of Morse Code proficiency requirement for HF access.

In order to encourage new comers getting in to Amateur Radio Service, internationally most of the countries have relaxed the Morse Code requirement.

Hence some countries have removed the Morse Code proficiency requirement for HF access and in some countries it has reduced to 5 words per minute (wpm).

According the modification made to the Article 25.5 of the ITU Radio Regulations at WRC – 2003 it says, that “administrations shall 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.”

2. Responses to the Consultation

Responses to this consultation paper may be forwarded by Hand, Post, E-mail or Fax to the Director-General, Telecommunications Regulatory Commission of Sri Lanka, 276, Elvitigala Mawatha, Colombo – 08, Sri Lanka on or before 31th October 2004.

For Further clarifications following Officers of TRCSL may be contacted.

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Please note that all comments received will be published in the TRCSL web site. Should you wish all your comments or parts of it to be treated as CONFIDENTIAL please indicate clearly and mark accordingly (for example with an header on each page stating CONFIDENTIAL when submitting your comments).

All comments received before the above mentioned closing date will be considered by the TRCSL and published subsequently, unless the person responding had requested the comments to be treated as confidential. The views of the TRCSL on the comments received will also be published.

3. Scope

In order to prepare the Sri Lankan telecommunications environment to embrace this global changes, and therefore to facilitate the increase of number of Amateur Radio Licensees in Sri Lanka, the Telecommunications Regulatory Commission is embarking on this Consultation to take a decision on Morse Code proficiency requirement.

4. Amateur Radio Licenses

The categories of license presently issued by TRC under Amateur service are as follows.

(a) Novice Class Amateur Licence, subject to following conditions:-

- (i) transmission shall be only in the frequency bands allocated in Annexure I;
- (ii) the rated peak envelope output power from final stage shall not exceed 100 watts for J3E and 50 watts mean power output on other emissions on HF bands.

The rated output power from final stage shall not exceed 10 watts for all emissions on VHF.

(b) General Class Amateur Licence, subject to following conditions:-

- (i) transmission shall be only in the frequency bands allocated in Annexure II;
- (ii) the rated peak envelop output power from final stage shall not exceed 500 watts for J3E and 250 watts mean power output for other emissions on HF bands.

The rated output power from final stage shall not exceed 25 watts for all emissions on VHF and above.

- (c) Advanced Class Amateur Licence, subject to following conditions:-
- (i) transmission shall be only in the frequency bands allocated in Annexure II;
 - (ii) the rated peak envelope output power from final stage shall not exceed 1000 watts for J3E and 500 watts mean power output for other emissions on HF bands. The rated output power from final stage shall not exceed 50 watts for all emissions on VHF and above.

This is summarised in Table I below with required Morse Code speed.

Table I – Present Morse Code Speed Requirements

License Category	Morse Code Speed	Frequency Bands and Power
Advanced Class	20 wpm	All Amateur bands as per Annex II, very high power
General Class	12 wpm	All Amateur bands as per Annex II with high power
Novice A Class	5 wpm	Few HF Amateur bands as per Annex I with low power
Novice B Class	not required	Only on 144– 146 MHz & low power

5. Proposals for Morse Code Speed Requirements

Considering the present status of the Amateur Licenses in Sri Lanka and taking account of the global scenario, the following proposals are made.

5.1 Proposal 1

Existing power limits and frequency bands for different licence categories will not be changed. Morse Code speed requirement in three classes will be reduced as shown in Table II and there will be only one Novice class licence category.

Table II

License Category	Morse Code Speed	Frequency Bands	Power
Advanced Class	12 wpm	All Amateur bands as per Annex II	No change to the existing power limits
General Class	5 wpm	All Amateur bands as per Annex II	No change to the existing power limits
Novice Class	not required	Existing Novice class Amateur bands as per Annex I	No change to the existing power limits

5.2 Proposal 2

Existing power limits for different licence categories will not be changed. However every licence category will have the access to all Amateur frequency bands as shown in Annexure II. Further Morse Code speed requirement in three classes will be reduced as shown in Table III and there will be only one Novice class licence category.

Table III

License Category	Morse Code Speed	Frequency Bands	Power
Advanced Class	12 wpm	All Amateur bands as per Annex II	No change to the existing power limits
General Class	5 wpm	All Amateur bands as per Annex II	No change to the existing power limits
Novice Class	not required	All Amateur bands as per Annex II	No change to the existing power limits

5.2 Proposal 3

Existing power limits for different licence categories will not be changed. However every licence category will have the access to all Amateur frequency bands as shown in Annexure II. Further Morse Code speed requirement in three classes will be reduced as shown in Table IV and there will be only one Novice class licence category.

Table IV

License Category	Morse Code Speed	Frequency Bands	Power
Advanced Class	5 wpm	All Amateur bands as per Annex II	No change to the existing power limits
General Class	not required	All Amateur bands as per Annex II	No change to the existing power limits
Novice Class	not required	All Amateur bands as per Annex II	No change to the existing power limits

5.4 Proposal 4

Existing power limits for different licence categories will not be changed. However every licence category will have the access to all Amateur frequency bands as shown in Annexure II. Morse Code speed requirement will be completely eliminated as shown in Table V.

Table V

License Category	Morse Code Speed	Frequency Bands	Power
Advanced Class	not required	All Amateur bands as per Annex II	No change to the existing power limits
General Class	not required	All Amateur bands as per Annex II	No change to the existing power limits
Novice Class	not required	All Amateur bands as per Annex II	No change to the existing power limits

6. Consultation

The TRCSL invites comments on the above proposals and, in particular, seeks the views of Amateur license holders as well as non-Amateur license holders on the following issues:

- 1) Would the above proposals encourage the new entrants?
- 2) What practical problems are foreseen if the Morse Code requirements are reduced or totally eliminated?
- 3) Should any additional rules be applied to Amateur licence?
- 4) Any other type of proposal other than above four?
- 5) Merits and demerits of each proposal?
- 6) Comments on any other relevant aspects of the proposals are also invited.

Annexure I

RADIO FREQUENCY ALLOCATIONS FOR NOVICE CLASS

<i>Frequency Band</i>	<i>Status</i>	<i>Class of Emission</i>
3500 – 3600 KHz	.. P	.. A1A, A1B, A2A, F1A
21125 – 21200 KHz	.. Pex	.. A1A, A1B, A2A F1B, J2A, J2B, J3E
28.0 – 28.500 MHz	.. Pex	.. A1A, A1B, A1C, A1D
144 – 146 MHz	.. Pex	.. F3E, FEF, F2A A1A, A1B, A2

P – Primary Service.

S – Secondary Service

Pex – Exclusive use by Amateur Radio Service only.

Annexure II

RADIO FREQUENCY ALLOCATIONS FOR GENERAL AND ADVANCED CLASS

<i>Frequency Band</i>	<i>Status</i>	<i>Class of Emission</i>
1800 – 2000 KHz	.. P	.. A1A, J3E
3500 – 3900 KHz	.. P	.. A1A, A1B, A1C, A1D, A2A
7000 – 7100 KHz	.. Pex	.. A2B, A2C, A2D, A3C, A3E
10100 – 10150 KHz	.. S	.. J2A, J2B, J2C, J2D, J3C
14000 – 14350 KHz	.. Pex	.. J3E, J3F, R3E, F1A, F1B
18068 – 18168 KHz	.. Pex	.. F1C, F2A, F2C, F2D, F3C
21000 – 21450 KHz	.. Pex	.. F3E, F3F
24890 – 24990 KHz	.. Pex	..
28 – 29.7 MHz	.. Pex	..
50 – 54 MHz	.. Pex	.. A1A, A1B, A1C, A1D, A2A
144 – 146 MHz	.. Pex	.. A2B, A2C, A2D, A3C, A3E J2B, J2C, J3C, J3E, J3F R3E, F1A, F1B, F1C, F1D F2A, A2B, F2C, F2D, F3C F3E, F3F
430 – 440 MHz	.. S	.. A1A, A1B, A1C, A1D
1240 – 1300 MHz	.. S	.. A2A, A2B, A2D, A3C, A3E
2300 – 2450 MHz	.. S	.. A3F, J2A, J2B, J2C
3300 – 3400 MHz	.. S	.. J2D CSF
5650 – 5850 MHz	.. S	.. J3E, J3E, J3F R3E
10.00 – 10.50 GHz	.. S	.. F1A, F1B, F1C
24 – 24.05 GHz	.. Pex	.. F1D
24.05 – 24.25 GHz	.. S	.. F2A, F2B, F2C F2D
47 – 47.2 GHz	.. Pex	.. F3C, F3E
75.5 – 76 GHz	.. Pex	.. F3F
76 – 81 GHz	.. S	..
142 – 144 GHz	.. Pex	..
144 – 149 GHz	.. S	..
241 – 248 GHz	.. S	..
248 – 250 GHz	.. Pex	..

P – Primary Service

S – Secondary Service

Pex – Exclusive use by Amateur Radio Service only