



c/o Carl R. Stevenson - WA6VSE
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June 7, 1999

Magalie Roman Salas, Secretary
Federal Communications Commission
455 Twelfth Street S.W.
Washington, DC 20554

Re: WT Docket No. 98-143, Notice of Written Ex Parte Presentation
and Delivery Thereof; Biennial Review, Amateur Radio Part 97 Regulations

Dear Madame Secretary:

This letter, being filed in duplicate and on diskette in Adobe Acrobat Portable Document Format (.pdf), along with paper copies and an Adobe Acrobat Portable Document Format (.pdf) copy (on the same diskette) of the accompanying letter, constitutes a memorandum of a written *ex parte* presentation made in letter form to the Commissioners, with a sufficient number of additional copies provided for distribution by your office to the Commissioners, the Commission's General Counsel, and the additional WTB personnel enumerated in the cc: list below.

The presentation is being made on behalf of No Code International in letter form by Carl R. Stevenson, WA6VSE, a member of the Board of Directors of No Code International as directed by the Board as a whole.

The presentation, elaborated in the attached letter, summarizes No Code International's objection to a recent letter from the American Radio Relay League ("ARRL" or "League") to the Commissioners, which we believe may constitute an improper *ex parte* presentation in WT Docket 98-143, in that we find no evidence of the League's having filed a notice such as this as required by Section 1.1206(b) of the Commission's Rules.

Additionally, the attached letter further summarizes No Code International's opposing views with respect to the League's mischaracterization of their own proposal (which was exceedingly poorly supported in the body of comment) as "a reasonable middle ground" and the League's further, inaccurate implication that their proposal somehow represents a consensus within the amateur community on the issues of license restructuring and Morse code test requirements.

Any questions concerning this presentation should be addressed to the undersigned.

Respectfully submitted,
No Code International



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cc: Christopher J. Wright, General Counsel, FCC
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