

Email response received 18 July 2005 from Dr M W Dixon G3PFR:

Question 1: *Do you agree with the proposal to introduce a lighter, electronic licensing process? If not, please explain why.*

No, because

- a “lighter, electronic licensing process”, especially via the Internet, will be insecure and potentially uncontrollable and, furthermore, infers future licence-free deregulation,
- Internet fraud in all forms is increasing and an electronic licensing process is potentially open to all kinds of abuse, and would debase the whole integrity of Amateur Radio and the Amateur Radio licensing process,
- there is a parallel with postal voting, which has twice failed me personally, and failed to convince me of its security and integrity (non-receipt of postal voting forms which appears to be common in rural areas),
- there is a sizeable minority of amateurs who do not (for whatever reason) want to use Internet access and could, therefore, be compromised.

Question 2: *Do you agree with the proposal to issue licences which remain valid for the life of the licensee? If not, please explain why.*

No, because

- it will be almost impossible to keep a licensee database up to date over potentially as much as a 70 year period (e.g. age 9 to age 79) in each individual case,
- it would be much more sensible to renew/review every 5 years (a similar period to driving licences beyond the age of 70 – although this is for a totally different reason) or 10 years (full Passport, at any age), thereby ensuring licensees update their records at least every five or ten years (annually at the moment).

Question 3: *Do you agree with the proposal to issue electronic amateur radio licences free of charge? If not, please explain why.*

No, because

- First, there is no such thing as a “free lunch” – that is, if there is no charge, then it is unlikely that future licence holders will have any “rights” to the spectrum currently assigned to the Amateur Services: it is conceivable that amateur spectrum could be “reassigned” to other users without any warning or reasons given (this could be perceived as a “hidden agenda”),
- I have grave reservations about the possibility of a “hidden agenda” behind this proposal.
- it would be possible for any “authority” to delete “free electronic licences” at any time in the future, without any pre-warning, “consultation”, or any other

“politically correct” reason,

- last, for the same reasons as my answer to Question 1 – lack of security and integrity,

Question 4: *Do you agree with the proposal to apply an administrative charge when processing postal applications for amateur radio licences? If not, please explain why.*

Yes,

- There should be a charge, as there is at present.

Question 5: *Do you agree that WT Act licence exemption for radio amateurs is not currently practical?*

Yes,

- WT Act licence exemption for radio amateurs is not currently practical.

Question 6: *What are your views regarding the possibility of WT Act licence exemption for radio amateurs in the longer term?*

WT Act licence exemption for radio amateurs, in my view, will **never** be practical, as it would

- be in complete breach of the ITU definition of the Amateur Services,
- imply that amateur radio operators are nothing more than “appliance operators” and therefore subject to possible future power, mode, and band limitations imposed by mandatory use of “type approved” equipment only. Many amateurs have already had problems with interference to and from “low-power, licence-exempt devices” in the mass market, and “pirates” - deregulation would only make it worse for the Amateur Services,
- infer that amateur radio operators are no different to CB operators, again suggesting that power, mode, and band limitations would be introduced in the future,
- lead to the amateur services being limited to “type-approved” equipment of commercial origin and possibly limited (low) power – as in CB,
- destroy the most important experimental element of amateur radio** inherent in the ability to self-design and construct equipment which is otherwise unobtainable in the commercial market. This is especially true for the bands above 1000MHz, assuming that these bands will continue to be available to the Amateur Services after the big “sell-off”.

(**“Full licensed radio amateurs are permitted to design, construct and modify their own equipment, and the private sale of such equipment between radio amateurs is also permitted” – quote - Ofcom).

Question 7: *Is maintaining the existing licensing regime but with an extended renewal period your preferred option? If so, please state the renewal period that you believe would be appropriate and explain why.*

Yes. As stated above (Q2), a period of 5 or 10 years is my personal preference.

Question 8: *Do you agree that the current licensing system is over-burdensome? If not, please explain why.*

No. It is not over-burdensome and has not been for the 45 years I've held a Full Amateur Radio Licence. Annual renewal is no problem at all, because I get regular reminders to register any change of circumstance and pay my licence fee by Direct Debit, so there's really nothing for me to do! *This cannot, in any way, be described as "over-burdensome"*

Question 9: *Do you agree with the proposal to apply an administrative charge when processing applications for a Notice of Variation to an amateur radio licence? If not, please explain why.*

Yes, it is perfectly reasonable to make an administrative charge for NOVs.

Additional comments.

I have been a licensed amateur (originally "Class A", now "Full") since 1961 and value my licence and callsign as **a unique privilege** which allows me to be identified and operate on all the allocated amateur bands, LF to microwave. It also allows me to design/build my own equipment without the need to purchase and operate "type approved", often over-elaborate and costly, commercial equipment.

I will object most strongly to any proposals which might curtail my (or my fellow amateurs') use of any of the allocated amateur bands, modes and power limits, or which restricted me to using "type approved" commercial equipment.

I have been an active member of the Radio Society of Great Britain (RSGB) for the same period and would support the idea of the Society being responsible for issuing and recording the issue of amateur licences. The Society is already responsible for education, publishing, issuing NOVs, maintaining the examination question banks and data for the annual "Yearbook", amongst other things. There is a popular misconception that the RSGB represents only its' members interests – this simply not true, as it represents all UK amateurs and has many educational links which could be severed as a result of many of the proposals in the "consultation"

Finally, I take issue with the Ofcom sponsored MORI "poll" which, by its distribution, is very clearly weighted in favour of recent and inexperienced "Foundation Licence" amateurs.

With due respect, they are unlikely to be members of the specialist groups mentioned in the "poll", nor are they likely to object to anything which might give them free access to any, or all, of the facilities currently available only to Intermediate or Full Licensees.

This would destroy the current licence structure (built up by dint of a lot of hard work and negotiation between the RSGB, the former RA, and City and Guilds, over many years) and the incentive to gain more privileges by progression from Foundation, through Intermediate, to Full licence.

The proposal is therefore regarded as retrograde in all respects!

Dr M W Dixon, G3PFR

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