

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

**Consultation title:** Consultation on a proposal to reform amateur radio licensing - A lighter, electronic licensing process

**To (Ofcom contact):** Amateur Radio

**Name of respondent:** Mr. Peter E .H. Day. G3PHO

**Representing (self or organisation/s):** Self, as Amateur Radio Operator G3PHO

**Address (if not received by email):**

### CONFIDENTIALITY

**What do you want Ofcom to keep confidential?**

Nothing	<input checked="" type="checkbox"/>	Name/address/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

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**Name** Peter E. H. Day

**Signed** (if hard copy)

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

**Answer 1. YES** but only if a **firm guarantee** could be given that:

- the licence would be recognised internationally by other radio regulatory authorities, so that I could obtain a reciprocal licence in other countries. For this, an initial paper document would be needed.
- a valid Amateur Radio Certificate to be mandatory for the issue of an electronic licence
- extremely rigorous protocols would be established to prevent, if not entirely eliminate, the possibility of fraudulent practices. Such protocols are difficult to maintain on the cheap as the major banks and organisations such as Ebay and PayPal are presently finding out.
- an accurate and regularly updated database of licensees was established.

**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.**

**Answer 2. NO.**

The nature of our amateur radio pursuit makes it vital that the licensing authority keep an accurate, up-to-date database of licensees, including name, callsign, type of licence, address, telephone number. This becomes very important in the following scenarios:

- Interference by (and to) amateur radio stations to (or by) public and military services such as TV and radio broadcasts, airport radar systems and the like.
- The abuse of the Amateur Radio licence by unqualified operators (or "pirates" as they are often known).
- National Security. It is not in the M.o.D's interest, or indeed the Government's interest, to have some 60-70,000 amateur radio transmitters that cannot easily be traced in a national emergency, to be either closed down or used for providing emergency communications.

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

**Answer 3. NO.**

- Freely given could mean freely taken away at a later stage. With the present system, I feel I have a **stakeholder** status and certain **rights** as a fee paying licensee. I therefore expect to be able to have some say, for example, in spectrum management

matters, through my national society (RSGB) and the IARU. By paying nothing I could forfeit these rights. A free licence would considerably weaken the face value of the Amateur licence and reduce it to nothing more than that held by a CBer or a dog owner. Having held a UK Class A Amateur Radio licence for almost 45 years I feel I have something to be proud of, having both worked hard and paid for the privileges it gives me. By paying nothing I could not hold up my head when explaining amateur radio to the general public or sorting out interference problems with a neighbour.

- Monies generated by a licence fee could (and should) be used, in part, to finance vital Ofcom services such as station inspections, interference investigations and other back up services that would maintain the status of Amateur Radio as a scientific and technical pursuit that sets high standards of entry and day to day operating. In recent years there has been far too much dumbing down of the first, which has led to a deterioration of the second. The introduction of the Foundation Licence, while to be applauded for enabling thousands of young and old people to get into Amateur Radio, did not offer incentives to progress beyond the entry level. In my view, Foundation should mean Provisional and perhaps a 2 year expiry date should have been set from the start so as to make further study to the Intermediate level mandatory. At the moment, there are lots of very inexperienced amateur operators on the air who have little idea of how to set up a radio station, free of interference to other users. Some blatantly abuse their 10 watt power restriction but little appears to be done about it. The official "policing" formerly operated by the RA and its predecessors seems to have almost disappeared from the amateur radio scene.
- This "dumbing down" will be made even worse of the licence is totally free.

**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.**

**Answer 4. YES.** I also feel that a small charge should apply to both electronic applications and postal ones

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

**Answer 5. YES ... ABSOLUTELY!**

The fact that Amateur Radio is strictly controlled by the WT Act and other regulations gives it its distinct identity as a **technical/scientific pursuit**. Were it to be exempt from the WT Act it would assume no more status than CB (which to my dismay is, along with Amateur Radio, classified by your department as "hobby radio" !). Amateur Radio is more than just a hobby.

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

**Answer 6. I never wish to see exemption from the WT Act**

- If it were ever exempt from the WT Act, future authorities such as your own could easily impose restrictions such as the use of ready made, type-approved equipment which would stifle the very heart of Amateur Radio .... that is experimentation, home construction and operating equipment. Recent changes in the licence structure have done nothing to preserve this heritage that has, for decades, provided the stimulus for young people to take up electronics and electrical engineering as a career and, at the other end of life's work cycle, to provide an intellectual and experimental pursuit for those retired people looking for a practical and challenging means of occupying their spare time.
- Exemption would certainly lead to considerable abuse in the form of increased levels of interference to other services. We already have several examples of illegal, unlicensed operating in the UK. Hang glider pilots have been frequently heard on the 144MHz amateur band, using FM hand held equipment for liaison with their ground station. A casual tune in the SSB mode, between 6 and 7MHz, will soon reveal the "pirate" operators who have set up nightly "nets" to chat with each other. These abuses have been going on for years yet it appears nothing has been done to stop it. Much of this problem is due to the fact that anyone can, regardless of what the law says, easily purchase transmitting equipment from Amateur Radio dealers without producing a valid licence. I therefore have grave doubts that a deregulated Amateur Radio would be "policed" any better than at present.

***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.***

**Answer 7. Not really as I would really prefer the status quo.**

However, if the cost benefit to Ofcom warrants a change then I would accept a five year renewal period.

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

**Answer 8. Definitely not.**

I have it fully automated via a Direct debit at my bank. However, I can readily understand that the processing of a few thousand amateur licences may be overburdensome to Ofcom.

**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.**

**Answer 9. YES**, so long as it just covers admin charges.

**However**, I would very much like to see a licence structure where much of what now requires an NOV becomes an integral part of the Amateur Licence ...for example the freedom to install an unattended microwave beacon transmitter or set up a VHF/UHF repeater or Internet Link node without prior application. Those of us with such technical interests are usually highly competent and certainly able enough to make sure that all interference problems and the like are covered. In the USA this is commonplace.

**Any other Comments**

- Ofcom appears to have little idea of what Amateur Radio is about! This has been made very clear when amateurs have telephoned your office regarding such matters as the radio amateur examination only to find that the Ofcom official didn't even know you ran the exam system. Other Ofcom operatives have mistakenly thought that everyone in UK amateur radio held an M3 licence! As a result of your reorganisation over the past two or three years, the former Radio Authority staff with Amateur Radio knowledge appear to have moved elsewhere, leaving we radio amateurs feeling cut off from what is being discussed and decided about our future. It would be to everyone's advantage if Ofcom retained or employed a small number of staff with experience of amateur radio and especially with sound technical knowledge.
- Please do not link Amateur Radio with Citizens' Band radio! They are poles apart.
- I am not happy that, of your recent Mori Poll among radio amateurs, 66% of the forms were sent to M3 (Foundation) and 2E (Intermediate... formerly Novice) licensees, thus leaving out the great majority of advanced licensees who have much more experience. One M3 even received his Mori form on the day his licence arrived in the post ... so how can one justify this poll as a representative sample?
- In my experience, most dedicated amateur radio enthusiasts want a structured licence system and a regulatory framework that includes station inspections, a sympathetic yet thorough interference investigatory body and recognition of their pursuit as a SERVICE as well as a hobby.

**Signed: P.E.H.Day, 2 August 2005**