

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Consultation on a proposal to reform amateur radio licensing (Of 243)

To (Ofcom contact): Amateur Radio Licensing, amateurradio@ofcom.org.uk
Ofcom, Riverside House,
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Name of respondent: Clive Ward G1EUC, CARS Training Co-ordinator

Representing (organisation): Chelmsford Amateur Radio Society (CARS) - Training Team

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing Name/address/contact details/job title

Whole response Organisation

Part of the response If there is no separate annex, which parts?

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes No

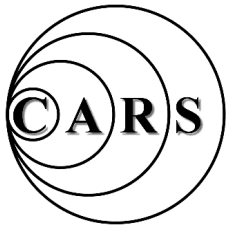
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Ofcom can publish my response: on receipt once the consultation ends

Name *Clive Ward pp CARS*

Signed (if hard copy)



Chelmsford Amateur Radio Society

Established 1936

Affiliated to the RSGB

Club Callsign: G0MWT

President: Harry Heap G5HF

Chairman: Chris Chapman G0IPU

Secretary: Martyn Medcalf G1EFL Treasurer: Brian Thwaites G3CVI

CARS Ref: 20050817

Web Address: www.g0mwt.org.uk

17-August-2005

Response to Ofcom Proposal to Amateur Radio Licensing (Of243) By the CARS Training Team

1. Introduction

Chelmsford Amateur Radio Society (CARS) is a vibrant club with over 100 active members holding amateur radio licences. Based in and around Chelmsford, Essex, it is nationally recognised as playing a very active role in amateur radio across a wide range of activities including social, operational and development/training aspects. The club is affiliated to the national body, the Radio Society of Great Britain (RSGB).

CARS members collectively have a huge range of technical experience and operate from HF to the microwave bands. With roots going back to the 1930s, the club draws much of its membership from professionals in the electronics and radio field.

The CARS Training team consists of a team of eleven volunteers (tutors and assistants) who have worked hard over the past three years to enthusiastically implement the joint Ofcom/RSGB three-tier training system. CARS tutors have participated in the 'Train the Trainers' initiative and are members of the RSGB Tutors Reflector.

The team has developed and provides a full range of Foundation, Intermediate and Advance Training courses both to the Essex region - and beyond via its online teaching slides. Approximately 50 pupils per year are being trained by the CARS team. Full details are available on the Internet at www.g0mwt.org.uk/training

2. Consultation Questions and Answers

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

Not unless it is done more carefully in close co-operation and with the full confidence of the RSGB and Amateur Community. If anything Ofcom/RLC has persisted with a wasteful paper process every year, not even bothering to incorporate old NoVs into the BR68 schedules. Any new process should lead to an improvement, and not a potential degradation in the callsign database and status of UK Amateur Radio. As Ofcom still refer to 'de-regulation' it is hardly surprising that Amateurs are suspicious of the long-term agenda.

Electronic systems should be secure (unlike PDF files!), integrate with the Exam Pass/Validation process and account for handling UK regional prefixes, International/Reciprocal Licences etc.

A system that is vulnerable to piracy and neglect will undermine the status of amateur radio both at home and internationally. It must not create a 'Digital Divide' and should permit for telephone/postal access.

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 – This will lead to a database full of inaccuracies and dormant callsigns, which will be increasingly of little value. The current annual system is very effective at keeping peoples location details up to date.

From experience a proportion of Foundation licensees who only have modest interest will not become active amateurs. Over time such people and others who lose interest will clutter the database making it useless as an indicator of amateur activity. Provisions for deletion, or removal in the case of abuse, must be incorporated.

Amateurs treasure an accurate callbook!

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

Generally NO - We are sceptical that there is any such thing as a free lunch as this undermines resources for the Amateur Services. The question jars with the fact that during the consultation Ofcom has withdrawn £46K support from the Amateur Exam process resulting in increases in Exam Fees to between £20 and £30 per licence tier. This results in a minimum charge of £60-75 for a new entrant to reach an Advance Licence, and more typically £100-200 depending on Courses attended. Ofcom is effectively raising burdens on its stakeholders – not reducing them.

At present there is no automatic feedback of the new callsigns that candidates obtain as a result of passing an exam. As it would not surprise us that in a new process examiners may be called upon to verify these passes, feedback of their new callsigns would be appreciated – and would help database accuracy.

In recognition of the costs and dedication involved in training we would request that applications for amateur radio licences as a result of successful examination passes should be free to act as an incentive.

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 – BUT any such charges should be nominal. Many (but not all) amateurs do have Internet access. Ofcom should have made the charge level public rather than deferring it to a separate exercise. In future these charges will increasingly be considered discriminatory under e-Accessibility or Disability Legislation. If postal volumes are small it may be simpler to waive it in any case. **Ofcom could create another Digital Divide here!**

See our answer to Q3 regarding waiving this in the event of successful exam passes, as this would act as recognition of achievement and mitigates the burden of higher exam fees.

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

YES – Furthermore Ofcom's use of the term 'currently practical' is of concern as to future intentions.

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

NO THANKS !!! This is neither practical nor desirable. It totally undermines the need for responsible use, training and discipline that is inherent in the Amateur system. Any changes, which must be agreed at ITU level, should only come from the Amateur Services themselves.

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 – For 3-5 years, but using a high-integrity modern electronic system which would keep costs low. A renewal requirement would underpin the accuracy of the callsign database, validate email addresses etc. Such a new system should be developed in collaboration with the RSGB Examination System. Any charges should be spread so lump sums do not act as a deterrent.

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

NO – not for established Amateurs, many of who automatically pay by direct debit.

Much of the burden is caused by Ofcom/RLC persisting with a wasteful paper process every year, not even bothering to incorporate old NoVs into the BR68 schedules, despite being reprinted and amended for the changeover from the former RA to Ofcom. This could easily have been improved without this consultation.

As per Q3, Ofcom has effectively raised the burden on Clubs and Candidates already!

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.*

NOT ENTIRELY - NoVs are granted for a wide variety of issues (Beacons/Repeaters, experimentation, Contests/Special events etc). NoVs for Beacons/Repeaters should not incur repeat annual charging once their initial spectrum application/clearance is complete.

Any charges must be nominal ones so as not to be unduly burdensome. The lack of charge details in the consultation does not aid assessment or transparency and the terms 'Spectrum Management/Pricing' in the document are most unwelcome in an Amateur context.

An e-NoV system should be developed to lower handling costs, and permit over-the-web transactions.

3. Regulatory Impact Assessment

Since the consultation started Ofcom changed its official policy process [1] on August 1st, partly as a result of a well-argued input by Chelmsford Amateur Radio Society

Quoting from [1], the updated policy states:-

5.13 When identifying the possible options, we will generally start by considering the option of not changing the regulatory framework, either by not introducing regulation or by retaining existing regulation. This option – no new intervention – will be the benchmark or base case against which other options will be judged

In our opinion the current consultation document does not comply with this and Ofcom are requested to update the RIA and to pay fuller attention and priority to this

- which is currently 'Alternative-3' and has been summarily dismissed

4. Reference

[1] "Better Policy Making", Ofcom's Approach to Impact Assessments, issued 21st July 2005, and effective from August 1st 2005