

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
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Name of respondent: Murray Niman G6JYB, MIEE

Representing (self or organisation/s): self

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

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and I authorise Ofcom to make use of the information in this response to meet its legal requirements. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom can publish my response: on receipt

once the consultation ends

Name *Murray Niman*

Signed (if hard copy)

Consultation on a Proposal to Reform Amateur Radio Licensing (Of 243)

Questions and Answers

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

YES - If anything Ofcom/RLC has persisted with a wasteful paper process every year, not even bothering to incorporate old NoVs into the BR68 schedules.

Electronic systems should account for handling UK regional prefixes, International/Reciprocal Licences, Exam Passes/Validation, NoVs, Repeater/Beacons etc. Precautions must be taken to avoid security flaws such as the ability to forge/crack Adobe PDF files.

The irritating option to totally withhold licensee's details should be modified so at least the County is identified in all cases (or the first alphabetical letters of the Postcode).

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 undoubtedly lead to an erosion of accuracy of the callsign database as it removes any incentive to keep details up to date as amateurs change email address, move house, change licence class or sadly pass away. An accurate licence database is also key to policing of the bands for pirates/interference. Amateur operations are international in nature and need to be kept in good order to meet obligations under ITU regulations.

Ofcom generally are withdrawing from command/control and reducing their staff numbers accordingly. It is therefore vital that any system left in place should be capable of being self policing, for which accurate databases, backed up by the future remote receiver monitoring network are essential.

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

NOT ENTIRELY - If they are free in all cases, frivolous applications will be encouraged (e.g. vanity etc).

Currently licences for under 21s and 75 or over are already free. The £15 /year for others is good value when compared to TV Licences, Passports, MoTs, ID Cards etc and is not a significant burden.

Applications/changes for new amateur radio licences as a result of successful examination passes should be free to act as an incentive. - See Answer to Q9 for when charges may be appropriate.

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 - as it will encourage a move to electronic processing. Any such charges should be nominal - in the £10-15 range for example. In the interests of transparency Ofcom should have made the charge level public rather than deferring it to a separate exercise.

It is important that in any new process applications/changes for new amateur radio licences as a result of successful examination passes are not penalised by the current postal-only process

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

YES - The Amateur Service and Amateur Satellite Service are defined under the International Radio Regulations. Licence exemption will disenfranchise amateurs, their privileges and their ability to self-train/experiment.

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

This is neither practical nor desirable and would inevitably diminish the status of the Amateur Services. In any case any changes need to be agreed at ITU level.

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 5 years, but using a modern electronic system which would keep costs low. A renewal requirement would underpin the accuracy of the callsign database, validate email addresses etc.

The irritating option to totally withhold licensee's details should also be modified so the County is disclosed in all cases (or the first alphabetical letters of the Postcode)

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

YES – see answer to Q1. In practice it is more burdensome for the administrators than for the licensee.

Any new system would be less burdensome if it was largely electronic.

A revised schedule (BR68) is needed in which the English is clearer and easier to follow.

- Section-7 on identification/callsigns being a classic and counterproductive example of awful Legalese.

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 endeavours – Contest Callsigns, Special Event Stations, Beacons, Repeaters, Gateways, 5MHz experiments etc.

A distinction should be drawn between general shared services (e.g. Beacons/Repeaters) which at present do not incur charges - and vanity callsigns, one-off events and attended systems where time-limited NoVs and charges can encourage efficiency. A review of NoV time periods which currently vary greatly should be undertaken in conjunction with interested parties.

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.

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