

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Proposal to Reform Ships Radio Licensing

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Name of respondent: Murray Niman MIEE

Representing (self or organisation/s): Chelmsford Amateur Radio Society

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

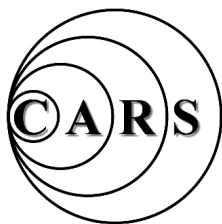
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Ofcom can publish my response: on receipt

once the consultation ends

Name *Murray Niman*

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: 20050503

Web Address: www.g0mwt.org.uk

3-May-2005

Response to Proposal to Reform Ship Radio Licensing

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 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 club incorporates a dedicated training team who have been strong supporters and implementers of Ofcom's current amateur radio licence structure and training/examination regime – training 50 licensees a year.

Quite a number of the clubs membership have connections with ships and small boat radio, both historic and current. Members have built or operated former BT coastal radio stations, designed and maintained Marconi, Decca and Raytheon Marine gear. Many members own dinghies, small craft and even larger cruisers, and sail in and around the Blackwater Estuary near Maldon – especially as many are members of the Marconi Sailing club. Our reply is based on this, and some helpful correspondence with Ofcom via our local MP for Maldon, the right honourable John Whittingdale

Consultation Questions and Answers

Question 1:

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

Progress is a good thing, provided it's well thought through in advance!

Acrobat PDFs are now very easy to handle to the point of not being very secure and easy to imitate. Thought also needs to go into how rule changes would be notified as people's email addresses can be very short lived.

Question 2:

*Do you agree with the proposal to issue licences which remain valid for the lifetime of the vessel ?
If not, please explain why.*

NOT YET - Given that it is important to ensure the integrity of contact details and licences, perhaps a 3-5 year licence would be a better interim step.

Question 3:

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

YES, but...

Its not the charge, it's the incentive/enforcement that matters. Ofcom mentions sanctions but probably have little resource/appetite for using them. Could for example the MCA (via the DTI) be empowered to give on the spot fines as part of their inspections?

Question 4:

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

YES, but...

We accept that some moderate charge may be inevitable for manually posted paperwork, but this should not be at such an excess level which deters users and results in not keeping records upto date

Question 5:

Do you agree that the transfer of licensing to the MCA would not offer any significant advantages over the existing licensing system?

NO. The MCA are dedicated to many aspects of maritime affairs, for both small and larger craft etc including Ships Radio Equipment inspections. It seems perfectly logical for Ofcom to simplify its own operations to use this as an opportunity to bring all matters under a 'one-stop shop'. This should be looked at in a much more positive manner than the clear Ofcom bias against this option. It is not clear what the legislative obstacle is, when other organisations already act as spectrum/licence managers for Ofcom

Question 6:

*Do you agree that the WT Act licence exemption for vessels that remain within UK territorial waters is not practical?
If not, please explain why.*

YES. Compliance with international shipping and radio rules needs to be maintained, especially in crowded EU waters as highlighted in the Ofcom document

Question 7:

*Do you agree that WT Act licence exemption remains a worthwhile long term objective?
If not, please explain why.*

NO. Unilateral UK action would be a lot of effort for dubious benefits and may have SOLAS implications

Question 8:

*Do you believe that WT Act licence exemption would have an impact on maritime safety?
If so, please explain why.*

YES – Uncontrolled and untraceable operation due to deregulation would both undermine the integrity of the callsign/MMSI and hinder SAR, as stated by the MCA in an earlier document. It would also hinder the ability to trace interference on international distress frequencies.

Question 9:

*Would you prefer to see the current licensing system maintained without change?
If so, please explain why.*

NO. Progress is needed, but the right sort of progress, well thought out beforehand, full agreed with the MCA etc, so that the integrity of Callsigns, SAR etc is enhanced and not undermined