

**Email response received 15 August 2005 from Mr Gordon L Adams,G3LEQ:**

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

*We are in favour of reducing administrative burdens and costs provided that such actions do not jeopardise the integrity of the UK Amateur Radio Licensing system.*

**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.

*We agree with the principle behind this proposal. A reduction in both administration and costs would be beneficial to both the Regulator and to the Licensee. However, the introduction of such an arrangement must not lead to de-regulation of the UK Amateur Radio Licence. Furthermore, it must not in any way jeopardise the recognition of this licence by any other overseas/foreign administrations, which might be to the disadvantage of a UK radio amateur, travelling through or visiting temporarily, another Country.*

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

*We do not agree because electronic systems operating via the internet are not secure and also any documentation exchanged by this means can be tampered with and misrepresented quite easily. Therefore a postal system is still essential, even if a Validation Document or Certificate is to be issued and validated for the lifetime of a licence holder.*

**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.

*All licensees must be treated alike, and all licence authorisations should be issued through the post in order to keep the documentation secure (see answer to Q3 above). An administrative charge of £10 to £15 would not be unreasonable on a one-off basis, bearing in mind the present amount of the annual amateur radio licence fee.*

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

*Not only is it not practical at the present time, bearing in mind the obligation of the UK regulatory authorities to abide by international agreements; it is would also lead to a total lack of control resulting in the type of anarchic behaviour to be found in Citizens' Band radio.*

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

*Such a longer term goal would be extremely unwise. De-regulation of the Amateur Service would lead to total chaos and the losing track of both the licence holders and the location of their transmitting stations. Evidence of this is already becoming evident in Countries where an element of de-regulation has been introduced (see Canada and the USA by way of example).*

**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 way.

*The existing licensing regime needs to be maintained, but the period of validity of the licence could be made lifetime subject to certain constraints. The location of the station, or stations, operated by the licence holder needs to be known at all times. Therefore, a detailed proposal is put forward below, as an Annex, explaining how this may be achieved.*

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

*The current licensing system has been in operation, and very little changed, since the end of World War II. In that time no complaints have been heard that it is burdensome. Indeed, sending off a payment to the licensing authority by the licence holder once a year is comparatively simple, compared with say renewing a vehicle tax disc. If the object is to save the regulator some money, and thus also reduce the cost to the holder of the amateur radio licence, then suggestions for a mutually acceptable solution appear in the Annex below.*

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

*This is not an unreasonable proposal, and indeed is being applied already in one instance where the Radio Society of Great Britain is acting on behalf of the Regulator. A modest charge of around £10 is acceptable, as this is not over-burdensome, but at the same time should eliminate applications having little merit.*

## **A VERY IMPORTANT ANNEX TO THE ABOVE ANSWERS**

The following observations represent some ideas that have been drawn up after a large number of group discussions, that have taken place over the last few months, concerning the "Consultation on a proposal to reform amateur radio licensing (Of 243)"

*We have a near life-long driving licence in the UK. Of course, the driving licence system is "policed" by the Police no less! Policing of any regulated privilege is necessary in order to root out abuse of the system.*

*We suggest that a parallel should be drawn, not with the driving licence, but with UK Maritime Radio Licensing, and in particular with the Maritime Radio Operator Certificate of Competence and the Maritime Radio Transmitting Equipment Installation.*

*If the maritime principles were to be adopted for UK Amateur Radio licensing, how might they be applied?*

*Firstly, a candidate for an amateur radio licence would attend a course of instruction in order to obtain a Foundation, Intermediate or Advanced Licence. Upon passing the candidate would receive a pass slip and call sign (if requested from a list of*

options) from the Radio Society of Great Britain (RSGB). In the case of the Advanced examination pass, the call sign could be any chosen one from the series available, say M6 to M9 prefix with two or three letter suffixes. An agreed fee would be payable for the call sign to the RSGB, or other appointed call sign issuer, in order to cover administration costs and the cost of maintaining long-term computer records. The fee might include an additional payment where the applicant has requested a special vanity call sign such as one with a two-letter suffix, or personal initials or some such.

The licence to transmit in the amateur bands would be vested legally in the Pass Slip together with a serial-numbered Amateur Radio Licence Validation Certificate (ARLVC). The Pass Slip would be issued by the examining authority (currently the RSGB), whilst the ARLVC would be issued by the regulatory authority (currently Ofcom). The holder of these two documents would not necessarily have to pay for a personal call sign, because the licence to transmit in the amateur bands, within the UK, would be represented by the afore-mentioned documents.

This concept would be similar to the situation obtaining some years ago when the Home Office Radio Regulatory Department issued an "Amateur Radio Certificate". If this is to be re-introduced, it would have to incorporate some of the elements of the current "Amateur Radio Validation Document" - in order that it should be duly recognised in other Countries. Foreign travel would of course require that the UK radio amateur had first obtained a UK call sign.

If this principle were to be adopted, it could be stated that the licence applicant was not paying a licence fee to the RSGB - but only an examination fee (which might result in the issue of a Pass Slip) and a call sign if requested. The document issued would however bear the current address of the new "licence" holder together with the address of any installation at which the requested call sign would be associated. The lifelong fee paid to the regulator (Ofcom) in respect of the ARLVC would in effect be the "Licence Fee". Thus the RSGB would not be in receipt of "licence fees", it would only be receiving administrative payments.

Licence holders would be required to advise the RSGB (or whoever), of any changes of transmitter installation address. The licence holder would be allowed as many separate installation addresses as required, provided that an administrative fee was paid for keeping updated the record of each one. The RSGB would be permitted to publish lists of call signs and installation addresses, provided that the call sign holder had not submitted a legitimate request for these details to be withheld. It would be made clear that the RSGB and Ofcom would be permitted to exchange this information under exemptions within the Data Protection Act.

The subtle point about the above proposal is that the Pass Slip holder has become qualified to operate a certain class of amateur radio station (currently say CEPT Class 1 and 2 in the EU etc). The would-be operator would have the choice of first paying a fee to register his/her station installation, or could go to another person's registered station (or club station) to operate. In the latter case the visiting operator would enter his/her call sign or ARLVC serial number in the other station operator's logbook.

*A registered station, would like an amateur radio repeater, require the call sign of its "keeper" to be displayed at the installation. Special requirements for Clubs and Long-Term Special Event stations would have club (e.g. "GX") or repeater-type (e.g. "GB") call sign prefixes using existing principles.*

*There might not be any need to have each registered installation examined before successful registration - visits only being required where interference or licence infringement might be suspected.*

*Some operators might wish to maintain more than one call sign, maybe a previously held Foundation or Intermediate one, or maybe an alternative Advanced call sign. There would be no objection to this provided that the relevant fees were paid to associate the given call sign with an installation address. Use of a lower grade call sign by a person holding a higher grade call sign would however require the user to observe the regulations relating to the call sign series being employed at the time.*

*A call sign might be made available for re-issue if the previous holder could be proved to have died - and the next-of-kin had no wish to claim it. Many operators would be pleased to request specific call signs, and this could be offered quite easily from a master computer listing, provided that a realistic fee was paid for such a service. Obviously call signs issued to Foundation and Intermediate licence holders would be more restricted in terms of the prefixes available.*

*The above proposals are we feel capable of offering Amateur Radio licence holders in the UK some friendly options. The situation regarding any existing licence holders wishing to change their call signs might have to be held over until a regime for new licence applicants had been tried and tested.*

*The current issue of whether the UK Amateur Radio licence is to become de-regulated, or not, would become academic, because Ofcom might have decided merely to allow certain outside bodies to "tender for administrative and record keeping work". The call sign would be a device that related to a registered transmitting installation, and only the "Amateur Radio Licence Validation Certificate" would be the regulatory authority to transmit - albeit issued on a lifelong basis - by the regulator Ofcom.*

***If Maritime Radio Operator Certificates of Competence (MROCC) and registered on-board Installations are possible - then why should not such a principle be applied to Amateur Radio licensing? The Royal Yachting Association issues the MROCC on behalf of the Maritime and Coastguard Agency - surely Ofcom is capable of setting up a similar system? Their Short Range Certificate would appear to be valid for life.***

*We hope that you find the above proposals helpful in your current deliberations.*

*Gordon L Adams G3LEQ - Chairman of the North Cheshire Radio Club*