

Email response received 16 August 2005 from Mr A Annan:

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

I am responding to this consultation as an individual. I am Technical Director (Environmental) and Chair of the EMC Committee of the RSGB. An official RSGB response to the consultation will follow as a separate matter. I am also a Business Fellow at a University and a person with a long term involvement in education and youth work. I am particularly conscious of the role of the Amateur Radio Service as a means of experimentation and self training in radio and electronics and as an entry point for the scientific and technical professions.

I am also aware of the value of the Amateur Radio Service for emergency communications in times of natural or other disaster situations.

Questions and Answers

Question 1: *Do you agree with the proposal to introduce a lighter, electronic licensing process?*

If not, please explain why.

It is not clear as to what may be meant by a lighter process, but electronic methods have the potential to offer a more accessible and responsive service with a reduction in operational costs. Security and user confidence in any electronic system will be a particular concern and the key role of the Radio Communications Examination database must be protected. Any electronic licensing system must be able to authenticate the applicant and verify the entitlement to a licence from the examinations database.

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, I do not agree with this proposal. Licence for life is potentially a move towards full deregulation and I do not see how any safeguards could be put in place against such a future move.

Under this proposal, it would be the responsibility of the licensee to notify Ofcom of any change of address. As home addressees and e-mail addresses are apt to change regularly, it will be difficult to sustain effective communications and an accurate database. It is likely that the result will be a database of the locations of licence holders that will rapidly come to be out of date. A database that does not have accurate up to date information will have little value. Any comparison with the issue of driving licences is misleading as the car tax system ensures that an up to date database of the locations and activities of licence holders is maintained.

There are various instances of where an accurate database of the locations of Amateur Radio stations will be important, but obvious examples are in problems of national security and the investigation of reported interference to other radio services.

Question 3: *Do you agree with the proposal to issue electronic amateur radio licences free of charge?*

If not, please explain why.

No, I do not agree with such a proposal. The Amateur Radio fraternity expects to be taken seriously in any future consultations or proposed changes to the Amateur Radio Service. I do not believe that this expectation is likely to continue to be met for any free service. At present

Amateur Radio is a cohesive community with an effective national society to represent its interests and this representation is in the best interests of all parties.

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, I agree with the levy of a reasonable charge

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

I agree that WT exemption is not currently practical as such a move would lead to the loss of all reciprocal licence arrangements with the administrations of other countries.

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

I see no possibility of exemption from WT licensing being applicable to the Amateur Radio Service at any time. Amateur Radio is a leisure and self training activity with a core of practical and experimental work. A certificated level of technical competence is important here and it is the sole reason for exemption from the regulations relating to the European R & TTE Directive, allowing the use of equipment designed and built by the amateur. Without this concession, the hobby will cease to exist.

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, I feel that five years would be an effective period, balancing accuracy with costs. Although retaining the examination and certification scheme will continue to be vital, not all the features of the existing regime need be maintained. The best of the Ofcom proposal concerning an electronic licensing system could be utilised.

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

I do not feel that the current licensing system is over-burdensome on the users. If it is felt to be burdensome to Ofcom, then there are other options open such as the transfer of the licensing operation to the national society. Again, an electronic system will offer efficiency gains.

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.*

Yes, I agree that a reasonable charge should be levied for NOV's when the request for an NOV is raised by an amateur.