

Response received from Mr H Aspinall G3RXH:

OFCOM CONSULTATION PROCESS

CONSULTATION QUESTIONS:

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

Reply: In principle yes, **but only as mentioned below.**

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

Reply: No. Unless there is a credible and workable method whereby Ofcom is made aware of the decease of licensees, licence records will become very inaccurate over time.

Further, with the present annual renewal and fee, disinterested licensees are at liberty to discontinue their licences and avoid payment of fees. The number of licences issued has been used as a yardstick to measure the health of Amateur Radio. The current method is inaccurate since it does not reflect the numbers of active participants (ie) people actually making use of their licences. This inaccuracy seems likely to increase if licences are issued for life.

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

Reply: No. The future of amateur radio principally depends upon two major factors namely:

- (a) Public and licensee apathy about modern amateur radio; and
- (b) Increasing levels of locally generated or propagated noise especially along electricity mains wiring and overhead telephone lines.

Although not widely stated, the amateur radio service is now a "nonprotected service, meaning that Ofcom will not undertake the investigation or removal of harmful interference to amateur radio reception. This was once a valuable service provided by the licensing authority. With the ever increasing numbers of domestic and industrial equipment producing this harmful interference, the future for amateur Radio on some short wave frequencies looks grim.

The Radio Society of Great Britain (RSGB) provides an interference advisory service but this has little practical application and it has no enforcement power to compel anyone to remedy harmful interference.

This power is vested solely in Ofcom. Any technical ability of amateur radio licensees to identify and locate the source of harmful interference is useless when the owner of offending equipment refuses to take remedial action

Section 1 (Forward) of the Consultation Document refers to Amateur Radio as an important and popular hobby. It states that Ofcom wishes to see Amateur Radio prosper.

On page 4 of the same document, Ofcom states "Of course spectrum management and enforcement activities are not determined according to the level of the licence fee."

Whilst the two above mentioned statements by Ofcom are heartening, if Ofcom is sincere, will they accept that the future of amateur radio is largely dependent on licensees being able to operate their equipment meaningfully, without harmful or often debilitating interference from domestic/industrial electronic or electrical equipment and that amateur radio needs to be a "protected" service. It is hard to see how the location and removal of harmful interference does not come firmly within the definition of Ofcom's spectrum management and enforcement activities for radio amateurs.

I consider in light of Ofcom's statements, Amateur Radio should be a "protected service". However, perhaps licensees should not expect the service free of charge and should pay for it either on a flat fee basis when required as with television licence holders, or alternatively via an enhanced regular licence fee.

If Ofcom refuses to protect the Amateur Radio service by providing some paid for effective interference investigation service, since there is little else provided, the licence might as well be free.

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.

Reply: No. I consider there might be a charge for all amateur radio licences whether they are processed electronically or via the post (see reply to 3 above), but that any administrative savings from use of electronic means be passed on to licensees who use them.

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

Reply: Yes, I agree.

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

Reply: For the miscellaneous reasons given in the Consultation Document itself, I consider WT act exemption for radio amateurs to be an ill conceived and highly undesirable concept.

It seems that any such exemption must inevitably lead to restrictions being placed on licensees regarding the type of transmitting equipment they are allowed to use. Without the need to prove technical competence as a condition of licence issue,

licensees would almost inevitably and perhaps understandably be limited by regulation to using commercially manufactured typeapproved transmitting gear to minimise the possibility of harmful interference to other services. Limiting full licensees to use of typeapproved transmitting equipment is totally alien to the traditional amateur radio concept of experimenting and being allowed to build and use their own equipment.

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

Reply: No. For reasons previously stated, licensees should pay for Ofcom to provide a professional and efficient official interference investigation service. If Ofcom refuses this, I suggest that if licences are given for life, some machinery be set up to periodically ascertain: (1) if the licensee is still alive; and (2) whether he/she still requires the use of an amateur radio licence

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

Reply: No. I have no problem with current formalities. I accept that Ofcom wants to reduce or eliminate its costs associated with the amateur radio service. I consider that Ofcom as the only UK radio regulatory agency has a valuable and essential part to play to the future of amateur radio in the area of interference investigation and removal, that this has to be paid for, and that one method of payment would be via the current licence fee scheme. I am however open to other methods of paying for this service.

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.

Reply: Yes, I agree.