

**Email response received 26 May 2005 from Mr A C Wadsworth C.Eng MIEE G3NPF,:**

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

**Answer 1:** I agree with the proposal, provided that it does not result in any dilution of the existing requirements.

**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.

**Answer 2:** I agree with this proposal as it simplifies the current situation whereby a person who has let his or her licence lapse must reapply to have the old licence reinstated with the original callsign. This seems to be totally unnecessary bureaucracy.

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

**Answer 3:** I agree with this proposal, as reducing an individual's expenditure must be a good thing. Also, it would reduce the cost of administering the Amateur Radio Service.

**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.

**Answer 4:** I agree in principal but think that any charge that accurately reflected the administrative costs involved would result in a ridiculously high charge. If the charge were to be set at an arbitrarily low figure, it would almost certainly cost more to collect and process than would be recouped. This would also seem to be contrary to the avowed intention to simplify and therefore cheapen the entire Amateur Radio Service licensing procedure.

Furthermore, this proposal would discriminate against those not having access, for whatever reason, to the Internet.

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

**Answer 5:** Not only do I agree that it is not currently practical but I consider it to be extremely undesirable. See my answer to Question 6 for reasons why I hold this opinion.

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

**Answer 6:** I consider that any proposal to exempt the Amateur Radio Service from WT Act requirements to be potentially catastrophic for the future wellbeing of the Service and would probably actually be illegal. Do not lose sight of the fact that amateur radio is regarded as a “service” under international law. Consequently, there are international requirements to be considered relating to treaty obligations and the maintenance of world-wide standards. There must be no possibility of the Amateur Radio Service sinking to the lamentably low standards of Citizen’s Band Radio.

Furthermore, how could callsigns be allocated under such a deregulated system? If callsigns were still to be allocated centrally by some regulating authority, there would be no savings in cost from those incurred under the currently proposed scheme. If callsigns were to be abolished in some unimaginable free for all, the Amateur Radio Service would cease to exist and Great Britain would be ridiculed by the rest of the international radio communications community, to say nothing of the total lack of official control of a potentially beneficial pool of expertise.

**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.

**Answer 7:** I think that there are only two viable renewal options. One is the existing system of a licence that is renewable annually and the other is a “licence for life”. I have already stated that the second option is my preference. An extended renewal period of (say) two or five years would not result in any meaningful savings in administrative costs and I fail to see what other advantages would accrue from such a proposal.

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

**Answer 8:** I agree that the current licensing system is over-burdensome to the administering authority, although the burden on individual amateur radio operators is minimal.

**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.

**Answer 9:** I do not agree with the proposal to apply an administrative charge when processing applications for a Notice of Variation to an amateur radio licence. I think that any charge that accurately reflected the administrative costs involved would result in a ridiculously high charge. Such a charge could well result in individuals

ignoring the normal terms of their licences and operating in a manner that, while causing no problems, was nonetheless illegal. The issue of an NOV would obviate this problem and give the authorities knowledge of what was happening.

If the charge were to be set at an arbitrarily low figure, it would almost certainly cost more to collect and process than would be recouped. This would also seem to be contrary to the avowed intention to simplify and therefore cheapen the entire Amateur Radio Service licensing procedure.

**General Summary:** I agree with the Regulatory Impact Assessment defined in Section 8 of the Consultation Document. The preferred option in the proposal, coupled with the current three-tier system of licensing, appears to be a very satisfactory basis upon which to build the future of the Amateur Radio Service in the United Kingdom.

Apart from initial misgivings regarding the abolition of the Morse proficiency requirement and the relatively simple "entry level" technical requirements, most of the amateur radio community appears to have accepted the existing system as a satisfactory compromise that has more benefits than detriments.

Doubtless there will be some who regard the present proposals as heralding "the end of amateur radio as they know it". I do not share that view and I am sure that careful study of the proposals will win over the detractors.

However, I am conscious of the fact that total deregulation appears to have only been ruled out in the short to medium term. The mere fact that it has been mentioned at all indicates that it still lurks somewhere in the depths of the OFCOM psyche. I am totally opposed to any such action.