

**Email response received 11 August 2005 from Mr Mike
Wheaton, G4ZPE**

ESSEX REPEATER GROUP

GB3DA – GB3DB – GB3ER – GB3CMS

5th August 2005

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

Essex Repeater Group (ERG) maintains repeaters and beacons in Essex. GB3DA on 2m, GB3DB on 6m and GB3ER on 70cms are strategically placed in Danbury in central Essex to provide coverage over most of the county including critical roads such as the A12. Our 10GHz Microwave Beacon provides a valuable service to amateur enthusiasts in the South East. Only a fraction of licensees in our region contribute to their upkeep. Our ability to manage the repeaters and monitor voice traffic depends on our ability to accurately identify users/callsigns etc. Whilst our members/users may submit their own individual replies, the response below is written from the repeater-keeping perspective which is ultimately performed under NoVs from Ofcom.

Consultation Questions and Answers

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

If not, please explain why.

NOT in its present form as Ofcom preferred option raises considerable concerns . . .

It is essential for ERG along with any other repeater group to be able to recognise and trace callsigns of users, both for general management and to handle cases of repeater abuse. For this, any licensing system must provide and maintain an accurate, reliable, pirate-proof database. We note that Ofcom admits that its preferred proposal will lead to inevitable degradation in this vital resource for repeater keepers. Given that we have had and continue to deal with interference and abuse cases (often with little Ofcom support), we find the preferred option unsatisfactory, and would urge improvements and safeguards. The callbook/callsign database is a vital resource for all radio amateurs, something Ofcom really should understand and appreciate.

In addition we would request that as part of any reform, the 'Particulars Withheld' entries are slightly modified to at least disclose the County (and ideally initial Postcode Letters) of all users. This would provide some reassurance to all other users, without compromising an individuals 'particulars'.

ERG would welcome a modernised online electronic process, but it needs to be one that has integrity.

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.*

NOT as envisaged at present. This is largely for our users to comment on. Clearly safeguards must be built in to test for change of address, silent keys etc. In addition the ability to remove a licence must be retained for severe cases of abuse/breach of licence conditions.

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

We understand that the current £15/yr licence provides a surplus that contributes to Ofcom's services including frequency clearances, and interference/monitoring. We are therefore concerned that such a change would reduce funds and Ofcom's support/motivation in this area, despite their assurance in the document.

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*

This is largely for our users to comment on. However we are familiar with the trends to e-Accessibility and differential charging could be viewed as discriminatory in future.

For Repeater Applications, Shutdown lists etc, the Repeater Community (inc. RSGB-RMC etc) has been keen to switch to electronic applications, and it is Ofcom who have been sticking to Paper!

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

YES - Furthermore we are concerned by the phrase 'currently'. Repeater and beacon operation is inherently based on unattended operation with typically 20Watts Power, and the ability to build and operate custom hardware. This would not be possible without the R&TTE exemption, or if we were limited to licence-exempt type approved hardware. Repeater construction continues to be an area of self-training and experimentation in the true spirit of the amateur licence with new developments occurring all the time. WT Exemption would kill this stone-dead.

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

This is not practical at all if the Amateur Services are to survive and prosper. Some of our systems such as our 70cms Repeater GB3ER and our 10GHz Beacon GB3CMS operate in shared bands where any move to a licence exempt basis would diminish our current Secondary Allocation status, and risk total loss of operation if the Primary user objects. See also our answer to Q5 above regarding R&TTE freedom etc. In addition, the repeaters would find it increasingly difficult to manage and be responsible for 3rd party traffic.

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.*

Our preferred option is anything that maintains an accurate callsign database. The present system does do that but also (seemingly deliberately) wastes reams of paper on renewals each year (a BR68 plus at least one or two notices to update it). Therefore a compromise of a secure electronic system with say a 3-5year validation check is reasonable, plus rapid updates for . . .

Many newcomers/callsign changes on GB3DA in particular occur as a result of the exam system. A freely accessible online list of validated exam passes/callsign changes would be most helpful.

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

It is not terribly burdensome for individual amateurs. As per our answer to Q7 above, we feel that Ofcom current paper process makes renewals unnecessarily burdensome for the administrator(s) and the RLC, but that is largely of Ofcom's own making.

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.*

NOT for Repeaters or Beacons, which provide a service to the wider community, yet find it difficult to recoup costs from users. Repeaters have a (currently free) NoV renewal per year per callsign. If not exempted or reformed, this would result in unfair and excessive costs to groups. Charges to deter frivolous vanity callsigns, transient special event/contest stations etc are not unreasonable.