

Email response received 9 August 2005 from Mr P Urwin G6RRJ:

### Questions and Answers

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

*If not, please explain why.*

**Yes, with reservations.**

**The current system is not over-burdensome on radio amateurs, and could continue as it is.**

**If Ofcom feel that it is over-burdensome on them or the RLC, then some streamlining may be appropriate.**

**I do not feel that the proposed electronic system will be secure or authoritative. PDF documents can be forged, and hard-copy versions of them can be modified undetectably. Since nobody is going to ask to examine a PDF file only a hard copy of it, (for example the police, or a foreign licensing authority,) issuing licences only on PDF would seriously devalue the licence document. Police etc. would have to refer back to the licensing authority to check the validity of the document, and that would increase the licensing costs over those applicable currently.**

**One notices that the Road Tax disk becomes more complex each year to defeat fraud; it is difficult to imagine a PDF Road Tax disk being acceptable. While there are fewer incentives to forge the amateur radio license, such incentives do exist.**

**Ofcom do not specify how the requirement to have passed the relevant qualifying examination will be checked when an application is made electronically.**

**An electronic system is not free of costs. Indeed it would be unlikely to pay back its cost in a reasonable period, especially if the required safeguards were incorporated.**

**On the other hand it should be possible to streamline the current postal system by the use of the same computer resources envisaged for on-line applications. The only manual processes should be processing money and updating addresses (etc). The day-to-day license re-issue and postage can be and should be fully automated. Where payment is made by direct-debit, credit/debit cards on-line or other fully automated methods then there should be almost no labour costs.**

**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. It is vital that an accurate address be held for every licensed radio transmitter. The amateur service should not be an exception. Ofcom has failed to prove in their consultation document that this is not an issue. While it would**

still be a requirement that an amateur must notify a change of address it is difficult to see how this will be policed.

A license for life is in actual fact a license for eternity, since there can be no serious expectation that it will ever be cancelled on an amateur's death, especially if they have not been active for many years. For this reason alone the database will be invalidated to the tune of around 1,000 records per year. Where a deceased amateur has no surviving family it would be impossible for anyone to initiate the process of removing his license registration. These incorrect entries would be obvious to anyone who knew the deceased individual as the RSGB yearbook is published each year and lists the same person, now dead twenty years, with his last known address, now a multi-story car-park. In only a few decades a high percentage of the listings in the Yearbook (and available to the MoD, police, Ofcom etc.) would be of dead people.

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

*If not, please explain why.*

**No.** I fail to see how the on-line system will have zero maintenance and running costs. In order to reduce the burden on Ofcom there should be some charge.

**A free on-line service discriminates against those with disabilities and/or those with no on-line access.**

**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.** There should be a charge set at some reasonable level, bearing in mind the costs of administration and the ability of the amateur to pay.

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

**Yes.**

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

**It is a bad idea, and it will remain a bad idea whatever happens in the future, even if other events make amateur radio obsolete. Qualification and licensing is at the heart of the radio amateur hobby. Making it license exempt would destroy the raison d'être of the hobby. It would be impossible to allow the amateur to construct his own equipment if that equipment was license exempt; primary band users, users of adjacent bands and foreign licensing authorities would campaign for its abolishment. A rapid and irreversible decline in equipment and operating standards would cause long-standing amateurs to leave the hobby, after which the amateur bands would be left to decline further. Finally the problems caused to other spectrum users would become so severe that Ofcom would abolish amateur radio altogether.**

**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 believe 5 or 10 years would be reasonable. Some balance should be struck between the need to maintain an accurate and dynamic register of amateurs, and the burden to the amateur and the licensing office of doing so. I believe both the RSGB and Ofcom are more capable of making this determination than am I, and the periods they have proposed are 5 and 10 years.

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

**No.** It is not over-burdensome on the radio amateur, especially if they chose to renew by direct debit. Whether it is over-burdensome on Ofcom or the Radio Licensing Centre I am not qualified to say.

However any streamlining of the licensing process could be carried out without impact on the radio amateur by way of automating the existing system. Human intervention should only be necessary for new licenses and maybe for changes of address. Online payment and automated printing and posting of the license would reduce all costs to the minimum without the risks associated with electronic license documents.

**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.** Administrative charges should be transparent, and should therefore be applied when there is administrative labour involved and be appropriate to the amount of labour involved. Having said that, the ability of the amateur to pay must be considered, and the pricing of a license with an NoV should therefore be comparable with the price of a standard license. Renewal of NoV licenses should not require any administration above and beyond standard licenses, and therefore no extra should be payable.

When an NoV is applied for, the amateur applying will be committed enough to pay a reasonable fee, and where the NoV is for a repeater or beacon a reasonable fee will usually be a small part of their expense. Where the NoV is for special event stations it is probably worth bearing in mind the advantage to the hobby represented by such stations in bringing amateur radio to the attention of the public, and the fact that many of them are set up to support a charitable institution. So while the individuals involved could probably afford to pay for a special event NoV, I should like to see Ofcom (and the RSGB) waive such a charge.