

Email response received 12 August 2005 from Vertex Standard Co Ltd and Yaesu UK Ltd:



Unit 12, Sun Valley Business Park, Winnall Close, Winchester, SO23 0LB

***OFCOM consultation on
The Future of Amateur Radio Licensing in the UK
Issued 26th May 2005***

***A response by Yaesu UK Ltd
In consultation with its parent company
Vertex Standard Co Ltd, Tokyo Japan.***

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Introduction

Vertex Standard Co Ltd is one of the major worldwide manufacturers of amateur radio equipment sold under the Yaesu brand name. We have been designing, manufacturing and selling Amateur Radio products worldwide for over 50 years.

Our products are used by millions of radio amateurs around the world on a day-to-day basis for communicating with their friends around the corner or on the other side of the world in all manner of self training activities using CW, SSB, FM and Data modes like RTTY, PSK31 and SSTV.

Amateur Radio forms a core part of our worldwide business and is strategic to the continued success and growth of the UK subsidiary.

We fully support the simplification of access to amateur radio by the introduction of the Foundation License, with the Intermediate and Full Licenses providing a development path within the hobby.

We recognize the importance that Amateur Radio can play in helping youngsters to select electronic engineering and specifically RF engineering as a rewarding and viable career selection.

Yaesu UK welcomes the opportunity to comment on the OFCOM proposal to reform Amateur radio licensing.

Consultation Questions:

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

We have always felt that a strong administration in the Amateur Radio Service has been of considerable benefit in the past to the perception and role of amateur radio in society today.

We have been supportive of the steps that the Radiocommunications Agency and the RSGB have taken in making amateur radio an attractive and easier hobby to enter.

We recognize and support the steps that OFCOM is taking to make a lighter regulator touch whilst still maintaining the regulations necessary to protect the amateur radio service.

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

Yes, the proposal for licenses for life is acceptable, provided the responsibility for keeping the information up to date is clearly on the radio amateur and a simple and secure method of doing so is provided.

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

The Internet provides a perfectly acceptable mechanism to deliver safe and secure services to the amateur radio community today. Radio amateurs have long been early adopters of many new communications technologies and so a large number are already have access to the Internet.

The Internet is used for shopping, banking and other secure services today. Adequate security measures should be taken to protect the data being exchanged between the user and OFCOM, with key fields like Callsign and reference number not able to be changed.

We are concerned that there will be a secure process for communicating with the radio amateur in the first instance to ensure that you are talking to the right person, and that they have the necessary certificates to obtain a license, but after that we do not see any reason why the radio amateur cannot be responsible for ensuring the information is up to date, as with other Government organizations like the DVLA and Social Security. Providing a secure web based solution is seen as a cost effective solution to the problem.

If OFCOM is able to commit to operating the web service free of charge to the UK amateur radio community for the foreseeable future then we have no objection to this option.

Question 4: *Do you agree with the proposal to apply an administrative charge when processing postal applications for amateur radio licenses? If not please explain why.*

Yes. An administrative fee to cover costs is not un-reasonable in our view; see our comments in Question 9.

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

Yes, We do not support this option in any flavor or under any foreseeable circumstances.

If the reason for this option being proposed is to make access to the amateur radio bands easier, as for example as a stimulus to an interest in electronics and RF engineering in general, then we do not agree for the following reasons:

1. Past experience with the CB bands in the UK should provide an indication of what happens when a part of the radio spectrum is deregulated. The problems would be multiplied many times both in number and complexity because of the worldwide nature of most amateur radio communications.
2. This option would affect the way that the rest of the world treated UK radio amateurs as well as breaking our obligations to international treaties.
3. UK radio amateurs would lose all privileges to operate outside the UK, and we believe would be 'thin edge of the wedge' on the demise of Amateur Radio overall.
4. In our opinion many of the amateur bands in the UK would become unusable in a relatively short period of time.
5. Sales of our amateur radio products would be severely affected. The closing of our Amateur Radio business in the UK would most likely follow with the consequential loss of jobs.

If the reason for this option is to reduce the 'burden' of managing the interference issues in the Spectrum, then we do not agree for the following additional reasons:

1. OFCOM as the UK Spectrum Regulator from the EU perspective has a legal responsibility to investigate and resolve interference issues to licensed services in Europe and elsewhere that come from the UK.
2. Making the Amateur Radio Service WT exempt will not remove the responsibility to investigate interference caused by amateur radio equipment to other licensed services.

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

We do not support this option at any time for the reasons expressed above.

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.*

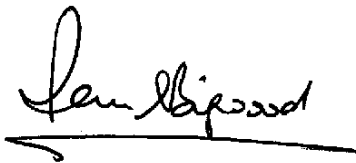
No, we do not believe that maintaining the existing licensing regime is a viable option today even with an extended renewal period of between 5 and 10 years.

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

Yes, the current licensing scheme could be simplified. If it was transferred to a web based service, with sufficient security to protect the database contents, then we see that there would be benefits to the administration of the Amateur service primarily in reducing costs.

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 license? If not, please explain why.*

Yes, Notice of Variations involving applications for Repeaters, Internet Gateways, Packet and Cluster nodes will require some work in frequency coordination and may involve communications with other 3rd parties, like the primary users of the band. We do not consider it to be unreasonable to charge an administration fee for this work. It should be possible to process the application on line, pay for it on line via a secure server and receive any queries and the final confirmation by email.



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