

Email response received 5 August 2005 from Dr R C Whelan G3PJT:

Dr R.C.Whelan, G3PJT

Introduction – general comments

In this proposal it is stated, 'Ofcom wishes to see amateur radio prosper', Ofcom wishes to 'safeguard' and to maintain 'integrity' but to remove 'bureaucracy' and 'costs'. Most of the bureaucracy exists in Ofcom/RLC. All that is needed is some reorganisation at Ofcom/RLC.

It is the use of the word, 'deregulation' and the inference of Q5 and 6, which has raised the question that Ofcom may be seeking in the longer term, to turn the UK amateur radio service into some sort of unregulated radio service, like CB. It would be very helpful if Ofcom could explicitly deny this without condition since the UK amateur radio community will fight any such moves towards deregulation strongly.

Serious efforts now need to be made to build a new positive partnership between Ofcom and the UK amateur radio community as represented by the RSGB. Through such a partnership it should prove possible for Ofcom to achieve its wish to reduce 'costs' and see 'amateur radio prosper'.

Consultation questions

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

Providing that there are proper safeguards against fraud and that the integrity of the amateur radio licence is maintained, then a lighter licensing process is acceptable.

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.*

The experience elsewhere (US/Canada) is mixed. The issue here is again one of information integrity. It is essential that the location of amateur radio licensees and stations is known accurately. A number of OGDs have made this point. Therefore some sort of formal update process is needed. This could be for example met with the requirement to renew every 5 or 10 years with automatic lapse of the licence if no response is received from the recorded address. The address database should be public and searchable on the web. It should not be possible for some licensees to withhold their address information.

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

Yes – provided that there is a secure link between the possession of a valid pass in the radio communication examination and the issuing of a licence.

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 – in view of the administration expense involved, but this is an activity which could be outsourced to the RSGB for example.

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

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

These two questions confirm the suspicion that Ofcom is indeed considering the deregulation of UK amateur radio.

Exemption should NEVER be contemplated, since that would certainly not make UK amateur radio 'prosper' and would lead to international repercussions through the ITU. A deregulated amateur service would greatly reduce amateur radio's credibility and valuable role in education, emergency and community radio and in radio communication development, etc.

Because radio amateurs have had to undertake a formal training process they realise the necessity for adherence to the radio regulations and the serious implications for public safety and security which can arise when these regulations are broken. The number of instances of serious flouting of UK radio regulations by radio amateurs is extremely small and far less than that caused by unregulated or unlicensed users of radio equipment.

The amateur service is enshrined in ITU agreements. It seems very short sighted for the UK to be seen to renege or undermine any provisions of such important international agreements.

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 it is – about 5 to 10 years should be a suitable period since the last update. Renewal should be electronic and free. It should also be possible for the licensee to download and have authenticated if necessary, hard copies of any relevant documents he/she may need – such as exam passes, licence documents and CEPT or other reciprocal licence agreements to facilitate international roaming.

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

No, not at all – from my perspective as a customer it seems to be very efficient with direct debit arrangements

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.

No – if Ofcom intend to introduce a 'free electronic licencing process' then the same system should be used to issue routine NoVs. In such cases no charge would be appropriate.

However NoVs which require technical evaluation, must be handled with a much better system than at present. It is very bad if the process of issuing NoVs inhibits any experimentation with new communication technologies. There would need to be some informed process such that such NoVs could be reviewed and approved quickly. It might be necessary to make charge for this.