

I am a radio amateur who has held an Amateur Radio licence for over 35 years. In this capacity I wish to make some comments on some of the issues raised in the above consultation document. My comments are personal and may not represent the views of others. The document is so lengthy that it would be impossible to cover all the points it raises, however, I should stress that the promotion of amateur radio should not be ignored in this process.

1 General

1.1 The RF spectrum is a valuable natural resource. It is the responsibility of OFCOM and all Governments to husband it properly so that it remains unpolluted and available to future generations irrespective of temporary financial considerations. It cannot be sold by any administration any more than the air we breathe.

1.2 The spectrum does need some regulation and policing. While this should be kept to a minimum it must be based on sound technical considerations rather than potential cash reward.

1.3 International treaties and agreements must be catered for. The UK cannot afford to be international pariahs. Its citizens who become radio amateurs must be able to communicate with amateurs from other nations without restrictions from those other nations because of low or inadequate qualification or licensing in the UK.

2 Amateur licences

2.1 There are areas where the UK amateur radio rules could be eased without problems:-

2.1.1 Log keeping. It is hard to see any reason to require every transmission to be logged compulsorily. These logs serve only to generate paperwork which is almost never officially used and to promote a backward looking defensive image. The requirement to keep a logbook should be made voluntary, not mandatory.

2.1.2 Restrictions on subject matter. BR68 restricts discussion of some subjects presumably on the basis that they could lead to disagreements. Threatening or offensive behaviour should be prevented but almost any real life conversation covers politics so how could this sensibly be prevented? The requirements should be changed to prevent threatening or grossly offensive behaviour rather than proscribe subjects.

2.1.3 The amateur service is not "protected" by OFCOM. Given this status it seems unreasonable to charge an annual licence fee. Either the service should be protected or the annual fee should be dropped in favour of a lifetime licence possibly with a charge for the issue and original certification.

2.2 There are some areas where relaxation of standards could lead to a free-for-all and should not be contemplated:-

2.2.1 Qualification. The Radiocommunications Agency reached agreement on a new licensing structure. In my view this eased the licensing requirements far too much in the case of the foundation licence which leaves little incentive for advancement. The new intermediate and full qualification process appears to me to be costly and potentially open to abuse. A simple answer would be to re-introduce the old RAE. Whatever is decided, it would be most unwise to further dilute the qualification requirement since this would inevitably lead to loss of discipline and poor operating. If OFCOM is to use a lighter control, then the elements leading to self regulation must be strengthened to compensate. However, the self regulation should not be delegated to bodies such as the RSGB as this creates a conflict of interests.

2.2.2 Issue of a unique callsign and certification should be done by the State which would no doubt wish to have the legal power to revoke licences. The power to do this should not be delegated, although there is no reason to prevent the administrative functions of this being sub contracted.

2.2.3 Some official body is required to police the spectrum to prevent abuse. Although for the amateur service such abuse is rare, nevertheless, if it does occur there has to be a mechanism to detect, investigate and prosecute a cure. This can only be done by knowledgeable people with the full authority of the State (presumably OFCOM). Attempts to remove the cost of this by having few or no rules is likely to lead to the worst excesses that were apparent in CB. Illegal power, out of band transmissions, foul and threatening behaviour etc.

3 Other factors

3.1 It is essential that the RF spectrum is protected from avoidable pollution. The current interest in PLT (data over electricity network) is such a case. It has been shown that PLT effectively pollutes the HF spectrum with broadband noise radiated widely from overhead power lines. This could blanket medium wave broadcast, amateur HF operation as well as military and air traffic HF communications. This kind of pollution would not be allowed if it were visible, audible or were poisoning of the air we breathe. It should be stopped forthwith.

3.2 The demand for spectrum for mobile phones and data will never be able to be satisfied. It is important to realise that charging large fees for this will simply result in higher charges to users. It is therefore only another less direct form of taxation in that we the citizens of the UK always pay the bill. Amateur radio can never compete in a sale to the highest bidder, but its value should not be discounted on these grounds.

I have restricted my comments in the interests of brevity. As a result the reasoning behind my comments has been omitted. I would welcome an opportunity to expand on the above.