

## Updating the Amateur Licence

### Q1 – Inclusion of the 470kHz band in the licence

The conditions of use of the 470kHz band listed in the NoV do not conflict with those applying in the present licence (though there is some duplication that needs resolution); so there is no obstacle to including this band in the licence schedules.

### Q1a – Inclusion of the 5mHz minibands in the licence

Because the main UK user of the 5MHz bands in question is the MoD and there is provision for contacts between amateurs and the military, the conditions of use (particularly the identification and location requirements) are slightly different from those for other amateur bands. (I assume that the omission of “Alternative Address” – see clause 2(1)(b) of the licence – from paragraph 2.27.9 was inadvertent.) As access is at present restricted to those who apply for a Notice of Variation, the ordinary amateur does not need to be aware of these differences; but if they become part of the licence they will become examinable and will have to be learned as an added complication.

If, as seems likely, ITU regulation 649 is adopted at the next World Radio Conference, the whole band from 5250 to 5450 kHz may be allocated to the Amateur Radio service. I have checked with RSGB HQ; there was a flood of applications when access to 5MHz first became available, but it has now slowed to an easily manageable trickle. To avoid a double change I recommend keeping access to the 5MHz bands on a NOV basis meanwhile.

### Q2 – Retaining a Club licence and callsign within the club.

The most likely occasion for problems is when a club official who is also the holder of the Club licence suffers a vote of no confidence and is asked to relinquish office, but in a fit of pique refuses to give up the club licence voluntarily. Ofcom clearly needs some means of compelling the surrender so that the club can regain the use of its callsign. (It is desirable that this hiatus is of short duration, but as the validity of a claim to represent a club may be disputable, the procedure set out in paragraph 2.41 of the consultation may be unavoidable.) I support the proposed change

### Q3 – Revocation for an offence under the Act

If Ofcom proposes to take power to revoke the licence of a person who has been convicted of an offence under the WT Act, then the third reason for disqualification should, to be consistent, have the six months limitation removed. This would still leave a person whose licence has been varied as a result of revocation action, not free to operate under supervision but free to continue under his or her own callsign. Are there enough such survivors of revocation proceedings to make this a problem? If not, the proposed change should be made.

Clause 4(4) of the licence should be changed to apply only when the licence has been revoked for some breach of the licence conditions or criminal action.

#### Q4 – “Automatic” revocation for non-revalidation

As Ofcom do not, and apparently cannot, automatically revoke licences for non-revalidation, the word “automatically should certainly be removed from the text.

#### Q5 – Changing the Fees wording

This strikes me as a backward step! It is desirable that the licence should say what it means rather than refer the reader to an Act of Parliament and regulations which 99% of amateurs will not have seen or be likely to see. It would make more sense to re-write the text about fees in the other licences or at least reconsider the wording of the General Terms Booklet.

#### Q6 – Occasions for transmitting the callsign

This is a welcome simplification but it could be taken further in that the proposals at paragraphs 2.61 b and c are merely specific cases of the more general 2.61 a. and could be omitted. Paragraph 2.62 is an additional reason for keeping the 5MHz bands on a NOV basis.

#### Q7a – So-called Regional Secondary Locators

[As Scotland, Wales and Northern Ireland are countries with their own legislatures, and Guernsey, Jersey and Man are not part of the United Kingdom, the phrase “Secondary Regional Locator” is a minor example of the unconscious English arrogance that has recently provoked nearly half the population of Scotland into voting to leave the UK. It should be replaced by “Country Locator”.]

The wording of clause 17(1)(ee) makes it clear that the Country Locator refers to the location of the station at the time, not the main station address of the licensee. The unanimous view of amateurs I have consulted is that this is the correct meaning and the preferred one. If you are operating in a different country of the UK it is more helpful for your contact to know roughly where you are rather than where you have come from.

If it is decided to make the use of Country Locators optional, this can most simply be done by retaining clause 2(2) but altering “:shall” to “may”. If they are used, it is important that they are used correctly. Simplification of clause 13 has already been proposed.

As there is nothing to distinguish a club licence callsign from any other full licence callsign a further simplification may be to scrap the separate club Country Locators listed in Note (c) of the licence.

#### Q8 – Country Locator in Intermediate callsigns

Because of the ITU rules about the formation of callsigns, an Intermediate callsign must always include a letter after the “2” but it should reflect the location of operation rather than the Home location – see response to Q7a above.

deal with the problem caused by the fact that some Intermediate callsigns have been issued with, and some without, a Country Locator letter in part 1 of the licence, clause 2(3) needs recasting. A possible wording to do this might be

“An Intermediate callsign must include one of the following letters after the ‘2’;

when operating I in	England	it should be	E
	Isle of Man		D
	Northern Ireland		I
	Jersey		J
	Scotland		M
	Guernsey		U
	Wales		W

If the callsign given in Section 1 of the licence does not have a letter after the 2, the appropriate one must always be inserted. If it does contain the letter corresponding to the Main Station address, this may be replaced when operating in one of the other locations listed above.”

(This is rather clumsy but may be necessary to avoid duplicated Country Locators. Intermediate licensees cannot have an option whether or not to use them).

#### Q7b – Location suffixes

These are optional, but if used they should be correctly used. This would be facilitated if the content of Note (d) were part of clause 2(1).

#### Q9a – Simultaneous transmission from multiple locations

This may happen if an amateur wishes to run a beacon or a digipeater for Packet radio at the main location whilst operating an attended station at some other location or mobile. If Ofcom has no objection to this, the present wording of clause 2(1) would allow it. It is likely to be of fairly rare usage as interest in Packet radio is falling away with the growth of mobile phones.

Because the source of a transmission needs to be identifiable, there should be no other occasion for transmission simultaneously from more than one location and using the same callsign to be allowable. Similarly simultaneous use of a club callsign by more than one member should not be allowed. During a “fox-hunt it is usually the fox who transmits and the “hounds” who listen; if any of the hounds needs to transmit they should use their own callsigns.

#### Q9b – Operation in CEPT T/R 61-01 countries

Most provisions of Clause 2 of the licence apply to all three grades of licensee.

As the rules about operating and who may operate in countries which have implemented Recommendation T/R 61-01 are set out in clause 16 and apply only to Full licensees, it would be better if any additional material required by the considerations raised in paragraph 2.85 et seq of the consultation were also included there. To avoid the present duplication it would suffice to extend clause 2(1)(e) to read “...Maritime Mobile location and possibly in certain countries abroad – see clause 16.”

Then clause 2(1)(f) could read “but NOT in any aircraft or airborne vehicle.”

#### Q10 – Raynet and emergency communications

The proposed relaxations will certainly allow Raynet volunteers to operate with more confidence.

In the present licence clause 1(2) directly contradicts clause 1(1). This anomaly could be removed by deleting the word “only” from clause 1(1

## Unattended and Remote Control operation

The footnotes on page 23 show clearly that the definitions of “Remote Control Operation” and “Unattended Operation” in the present licence are virtually identical. To be consistent with ordinary English usage the definition of Unattended Operation should be re-defined as “operation when the radio equipment, wherever situated, is working but not under the continuous control of the operator”. This would include the situation where the equipment is connected to a TNC or a computer so as to be able to receive and transmit data without operator intervention; and also operation of a beacon automatically transmitting a callsign and pre-set data. Both such uses are covered in clause 10(1) and are subject to a maximum power limit of 25 watts pep e.r.p.

The present definition of Unattended Operation is, in fact, what most people would describe as Remote Control operation! It is covered in clause 10(2) but the passage in brackets should be removed. Some amendment of the present clause 11(2) may be necessary because any control signals sent by radio are not addressed to other amateurs or the stations of other amateurs

## .Beacons, Direction Finding and “Fox-hunts”

If the “fox” transmitter is operating automatically it counts as a beacon, for which the power limit is 25 watts e.r.p. pep. But beacon antennas generally, and fox-hunt beacons in particular, are normally omni-directional, so the significance of e.r.p. in this context is that if the concealed antenna of the fox transmitter is less efficient than a half wave dipole, as is likely to be the case, the power output of the transmitter may be above 25 watts to a corresponding extent.

However if the fox transmitter is operating under remote control it does not conform to the definition of a beacon; hence none of the limitations of Schedule 2 are applicable. Is this the intention?

## Miscellaneous

### Maritime mobile operation

The dividing line between “Mobile” and “Maritime Mobile” has recently moved from between tidal and non tidal waters to inside and outside the coastal low water line. A more logical distinction would be the legal one— between operation within UK jurisdiction, including UK territorial waters, and at sea in International waters where jurisdiction depends either on the country of registration of the vessel or on international treaties governing the law at sea. The present up-dating exercise would be a suitable occasion for making such a change. It would allow Intermediate licensees to operate in coastal waters – where they would be least likely to cause interference, but limit ocean-going operation to those with more capability for dealing with communication problems arising far from land.

At present the rules about operation on a vessel are scattered between licence clauses 5, 9 and 12; these would be better grouped together and consideration given to lightening them somewhat, bearing in mind that the Station or the radio equipment may be something carried in the operator’s pocket ,