

Representing:

Self

Organisation (if applicable):**What additional details do you want to keep confidential?:**

Keep name confidential

If you want part of your response kept confidential, which parts?:**Ofcom may publish a response summary:**

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

I would like the new licence document to be less ambiguous on, unattended operation, handling of 3rd party radio amateur messages and the interconnecting of radio amateur network to the internet. With specific focus, but not limited to, Automatic Packet Reporting System (APRS) operation.

In section H of the Notes to Terms, Provisions and Limitations Booklet BR 68 it states: "Except as specifically authorised in writing by the Secretary of State, the Licensee may not permit the automatic reception and or transmission of messages between the amateur radio service operated in accordance with section 1 of the Act and other telecommunications networks"

A copy can be found here:

http://www.ofcom.org.uk/static/archive/ra/publication/ra_info/br68r11/br68.htm

The problem is that this sentence has not been copied over in any form to the newer OFCOM T&C and no one really knows what OFCOM stance is on connecting Radio Amateur networks with the internet. E.G. for APRS, real time propagation reporting, or for uploading real time heard CW or datamode users = automatic DX clusters.

Some believe the restriction still existing and an NOV is required, other don't. Newer radio amateurs that have never seen the old BR68 T&C's wouldn't know that there has ever been an issue.

I would like a statement from OFCOM within the new licence conditions document of what the requirements are. If this old clause was still enforced today it would not only effect APRS iGates (rx or 2 way), IRLP/Echlinks but also other on-line radio amateur services such as WSPRnet, Reverse Beacon Network, PSKreport, and other automatic propagation reporting websites.

I think it would be really hard to enforce a NOV requirement for an RX only automatic report system such as an APRS iGate, as there is no licencing laws preventing a normal member of the pubic creating an RX only iGate (apart from not having an APRS-IS passcode), so why would radio amateurs be prevented from doing the same.

Clarity is required to why a NOV is required for APRS iGates. Is the NOV required for unattended access, for interconnecting amateur networks with the internet, for allowing transmission of third party radio amateur messages or is the NOV required to do all of the above at the same time?

Question 1:Do you agree with the proposal to include, as a matter of course, the 470 kHz and 5 MHz bands into the Licence for all Amateur Radio (Full) licensees?:

No - Not as proposed. I agree that the bands should be made available to all Full Licencees but in exactly the same way as other bands to which amateurs have access on a Secondary basis. The standard wording applicable to other amateur bands should suffice i.e:

"Secondary. Available on the basis of non-nterference to other services inside and outside the UK" Furthermore some of the proposed clauses set concerning precedents that if subsequently applied to other bands would radically change specific aspects of amateur radio in the UK. Of particular concern is Paragraph 2.26.6, which should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3

With respect to Paragraph 2.26.6, near-field measurements at these frequencies are very difficult to determine with any accuracy and in any case are irrelevant at the power levels in use. Clause (e) in Notes to Schedule1 of the existing licence is sufficient and does not need to be reinforced in relation to the 472kHz entry.

Question 2:Do you agree that expressly linking a Full (Club) Licensee?s authorisation to use the spectrum to his or her representation of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:

Yes

Question 3:Do you agree that Ofcom should include a further ground of revocation in the Licence as proposed above in order better to align Clause 4 with the definition of ?Disqualified Person??:

Yes

Question 4:Do you agree that the word ?automatically? should be removed from Clause 4(5) of the Licence, in relation to the revocation of the Licence for failure to comply with the revalidation requirements?:

Yes

Question 5: Do you agree that Clause 15 of the Licence should be updated to reflect the wording included in Ofcom's General Licence Conditions Booklet?:

Yes

Question 6: Do you agree that Clause 13 of the Licence should be amended to allow for a simpler, more flexible approach for identifying Amateur Radio stations?:

No - Not as proposed. A clear definition of callsign usage and the current maximum interval of 15-minutes should be retained. However the requirements that a station must be clearly identifiable at all times and that the identity be given in a format consistent with the modulation in use are supported (but that specific terms such as voice or Morse Code should not be used).

Question 7: Given the current uncertainty amongst Radio Amateur licensees in relation to Clause 2(2), do you believe that it would be a practical solution for Ofcom to remove this Clause and to insert additional wording into Clause 13, as proposed above?:

No - there is no need to change current mandated and widely accepted practice. Any change of current practice will lead to both confusion and disruption both nationally and internationally. To do otherwise would do away with more than 50 years of practice, widely understood throughout the world and would create far more confusion than is currently alleged to exist

Question 8: Do you agree with Ofcom's proposal to amend Clause 2(3) of the Licence to require Intermediate licensees to transmit a call sign that reflects the location of their main station?:

No I disagree - All call sign classes should be treated in the same way by retaining the current clause in respect of the callsign prefix

Question 9: Do you agree that replacing Clauses 2(1) and 16(1) with a new Clause to simplify and bring together all of the licence conditions relating to the operation of radio equipment away from the Main Station address will make these provisions clearer?:

Yes. I would also like further clarification on what is approved for unattended operation from the main station address. Specifically for packet, beaconing and APRS operations.

In the notes on page 23 of the licence document, second last paragraph:

"(2) It is permissible to transmit positional information using automatic position reporting software on a spot frequency of 144.800 MHz at any one temporary location not within 50 km of NGR TA 012869. The maximum permitted period of unattended operation is 30 minutes."

There is no mention of unattended operation of APRS (automatic PACKET reporting SYSTEM not automatic position reporting software) from the station main fixed location. E.G. is it possible to have APRS beaconing from the main licence location 24 hours a day?

On the subject of APRS, there is no need to specify the frequency for APRS as APRS is used on a number of frequencies internationally that can be heard within the UK specifically on 145.825MHz from the International space station and previously from amateur satellites. There is also a large European HF APRS network on 10.147MHz USB and 14.103 LSB. Its is also used by RAYNET on there own RAYNET frequencies.

I would like the frequency for APRS to be removed to allow UK radio amateurs to use APRS on HF via the International Space Station, and on any new APRS enabled amateur satellites.

Question 10:Do you agree that the proposed changes will clarify RAYNET operation under the Licence?:

Yes