

BASIC DETAILS

Consultation title:

Updating the Amateur Radio Licence

Maintaining licence terms and conditions

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Representing (self or organisation/s): Self

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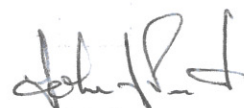
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Name John J PINK

Signed (if hard copy)



CONSULTATION QUESTIONS

Q1. 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?

A1. I agree with the proposal for the 5Mhz band, but I am concerned with the possibility of 470kHz causing interference by ingress into the IF stages of broadcast receivers. Whilst there are fewer of these now, there are still substantial numbers of listeners to local radio services transmitted in the medium wave bands, that still use IF stages around these frequencies.

Q2. 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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?

A2. I am uneasy with this proposal and the background reasoning. Whilst it is desirable that the call sign remains within a club, experience with several clubs leads me to believe that the organisational structure of many are a source of vulnerability.

Regrettably clubs morph, and it is not always clear where responsibility rests. I suggest that the call sign holder should be "the president of the club". On election of a new (president) holder it should be a requirement that the Ofcom licence holder information is updated on the web site. This is not too onerous a task.

Q3. 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'?

A3. Yes!

Q4. 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?

A4. Yes.

Q5. Do you agree that Clause 15 of the Licence should be updated to reflect the wording included in Ofcom's General Licence Conditions Booklet?

A5. Yes

Q6. 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?

A6. Concern here! Whilst many older operators are highly disciplined, and fully understand the art of message communication, fewer newcomers follow the same processes. I am against relaxing procedural practices, so I do not agree.

Q7. 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?

A7. I do not agree!

It is not impractical for even mobile operators to use the correct RSL. They should understand which country/region or whatever they are in, and use the appropriate RSL. It is rare for an operator to cross a boundary "frequently", as appears to have been suggested, and even if this does happen, most if not all Country/County boundaries are well marked - and are a sense of pride to the local inhabitants.

Q8. 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?

A8. Yes!

Q9. 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?

A9. Yes! Clarification on this topic is long overdue.

Q10. Do you agree that the proposed changes will clarify RAYNET operation under the Licence?

A10. Yes.

OBSERVATION

I believe that opportunities are being missed in the clean up the Radio Amateur Licence conditions.

The whole approach to the proposed changes is based on reviewing the current licence document, without apparently looking into the wider issues.

For example:-

eSSB

I recently wrote to Ofcom regarding the use of "eSSB" on the HF bands, which has a very detrimental impact on other users. The current licence does not indicate the bandwidth of a transmission, simply referring to:-

(a) The bandwidths of emissions should be such as to ensure the most efficient utilisation of the spectrum. In general this requires that bandwidths be kept at the lowest values which technology and the nature of the service permit. Where bandwidth-expansion techniques are used, the minimum spectral power density consistent with efficient spectrum utilisation should be employed.

I believe that this leaves interpretation wide open, which should be rectified by adding wording to the licence indicating what a 'necessary bandwidth' for transmission should be. This could be in a tabular format for the different modes.

Hamnet

The modifying of Consumer Off the Shelf Wireless LAN devices for specialised amateur use is widespread in mainland Europe, especially Germany.

There are already a few nodes established in the UK.

The Consultation, and its proposals present an opportunity for Ofcom to influence this aspect of amateur radio at an embryo stage. Ofcom could make clear its attitude to the spread of Hamnet networks in the United Kingdom.

The present arrangements in Germany use IP like URLs, which hide the real amateur station call sign - although this may be available through the address provider.

Internet and Hamnet messages may be passed transparently over either medium.

Please ensure that these topics are not missed, even though it is not covered/presented in the consultation, it would be better to follow with a second round consultation, rather than delay any changes for another 5 or so years.

John PINK G8MM

An independent respondent.