

Title:

Mr

Forename:

Greg

Surname:

Mossop

Representing:

Organisation

Organisation (if applicable):

The Radio Amateurs' Emergency Network

Email:

What additional details do you want to keep confidential?:

No

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:

The Radio Amateur's Emergency Network would welcome the opportunity to discuss these proposals, along with other areas of concern which were raised prior to the consultation but not treated in the consultation document.

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?:

The Radio Amateurs' Emergency Network continues to question the effectiveness of the antenna height restriction expressed in 2.27.3 of

the consultation as some Emergency centres may have rooftop access in excess of this height.

With regard to the general inclusion of this band into the Amateur licence, the value of the NoV process in providing Ofcom with up to date contact details for the prompt closedown of interfering stations should not be underestimated.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

This question is outside the remit of the Radio Amateurs' Emergency Network to comment on.

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'?:

This question is outside the remit of the Radio Amateurs' Emergency Network to comment on.

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?:

This question is outside the remit of the Radio Amateurs' Emergency Network to comment on.

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?:

This question is outside the remit of the Radio Amateurs' Emergency Network to comment on.

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?:

Since it is practicable for all stations to identify at the beginning and end of every transmission then this would lead to the welcome state that all stations were as unambiguously identifiable as Ofcom required. However we doubt that this was the intent in framing this proposed clause. We consider that the existing clause provided adequate flexibility and no change is required.

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?:

This question is outside the remit of the Radio Amateurs' Emergency Network to comment on.

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?:

This question is outside the remit of the Radio Amateurs' Emergency Network to comment on.

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?:

This question is outside the remit of the Radio Amateurs' Emergency Network to comment on.

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

Not completely.

While the additional clause permitting encryption of messages will ease the minds of our User services who are endeavouring to comply with the 7th Data Protection Principle when handling casualty data i.e.

"Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data." where the interception of data transmitted 'in the clear' on amateur channels would be a route for 'accidental loss' if intercepted the clause as written is not geographically limited to communications solely within the UK. This geographical limitation is required to comply with the Radio Regulations, specifically; 25.2A

1A) Transmissions between amateur stations of different countries shall not be encoded for the purpose of obscuring their meaning, except for control signals exchanged between earth command stations and space stations in the amateur-satellite service. (WRC-03).

The proposed amendments to Clause 11(2) will also have the unintended consequence of restricting 'third party traffic' previously known as 'Greetings Messages'. Currently any Full licensee may permit a non-licensed person to send a message providing the equipment is operated by the licensee (Clause 3(4)). Those messages in turn though had to be addressed (or routed through) other amateur stations. The proposed wording for Clause 11(2) makes this operation unclear and only able to be deployed in emergencies. Since the passing of 'welfare

messages' for evacuees is something which would ease the load in Evacuation Centres (if we choose to pass such messages) then this proposal would limit the range of communications we could provide to our communities rather than widening it.

The Radio Amateur's Emergency Network would welcome the opportunity to discuss these proposals, along with other areas of concern which were raised prior to the consultation but not treated in the consultation document.