Dr Ian Broadwell (G0VIH)
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11th November 2020

Dear OFCOM,

I have worked as an RF test engineer for many years and have become very familiar with MPE / SAR calculations, exclusions and assessments for the FCC, ISED and EU regulations. I currently work as a TCB for Element Materials Technology in Hull. I was licensed as G0VIH when I was 17 and remain am a keen amateur.

I agree that the public (and members of one's family) should not be exposed to unnecessarily high RF power densities / field strengths / ERP/ EIRPs. What I am proposing is more about current licensing tiers and entitlements. A-class licencees are those who have demonstrated the highest level of technical competence. They have earned these enhanced transmit powers due to demonstration of ability and understanding by the exams undertaken.

Rather than limit powers below the current licensing condition set out (ie maximum of 400W PEP in some bands) perhaps they could remain in place with an additional license variation which could take into account the following:

- Space available when transmitting – transmitting on private land like farm
- Limiting access to non members of the public and families of hams – ie field day
- Hams who possess the necessary equipment to measure the ERP/Field strength
- Create an independent (not for profit) organization which could be affiliated to the RSGB but legally accountable to OFCOM for ensuring higher tier licence variation compliance.

Given the backdrop of new 5G services and RF technologies which has bred widespread public distrust, bringing some sort of limited compliance to the hobby of amateur radio I see as having a beneficial effect.

Hams are largely self-certificating in terms of licence condition compliance. With a market awash with high power linear amplifiers and a limited OFCOM budget to police new proposed licensing restrictions perhaps this could offer an alternative way forward.

Amateurs could access the same higher-tier powers on a rolling 3yr compliance cycle, charging a small fee of say 30-40 pounds to have someone check RF field strengths at maximum key down powers with calibrated equipment. If this was administered as a not for profit entity charlatan businesses could be muted.

My final comment is one about USA and the Federal Communication Commission. As we already appreciate the USA is not the EU and both have their own regulatory systems. The FCC's radiological protection limits for non- ionizing radiation are significantly more stringent than the EU, however radio amateurs are still allowed up to 1500W PEP for the higher tier license class. The USA is a big country with many farms and ranches. Hence my comments herewithin.

Kind Regards

Dr Ian Broadwell.