

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Consultation on a proposal to reform amateur radio licensing - A lighter, electronic licensing process

To (Ofcom contact): Amateur Radio

Name of respondent: Ray Howells G4FFY

Representing (self or organisation/s): Surrey Radio Contact Club (SRCC)

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What do you want Ofcom to keep confidential?

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Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

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Name *Ray Howells G4FFY*

Signed (if hard copy)

Question 1: *Do you agree with the proposal to introduce a lighter, electronic licensing process? If not, please explain why.*

Yes. The “lightness” referred to here is understood to be a reduction in the costs involved, both to Ofcom and to Amateurs. As such, it is welcomed, as long as there is no danger that technical requirements are reduced under the excuse that “funding is no longer available” or similar. We would also like to see a link between the licensing database and the examination database to ensure the authenticity and identity of new applicants applying for an amateur radio licence.

Question 2: *Do you agree with the proposal to issue licences which remain valid for the life of the licensee? If not, please explain why.*

Yes, providing proper procedures are put in place to ensure the licence database is maintained fully up-to-date and any withdrawals of license because of non-conformance with regulations are properly enforced.

Question 3: *Do you agree with the proposal to issue electronic amateur radio licences free of charge? If not, please explain why.*

Yes, although the need to pay an annual renewal fee acts as a filtering system for the in-active Licensee's, and also act as an automatic database updating system.

Question 4: *Do you agree with the proposal to apply an administrative charge when processing postal applications for amateur radio licences? If not, please explain why.*

No, it would place an unfair burden on those who for whatever reason do not have, or do wish to have, a computer or access to E-mail/Internet. The number involved would be relatively small and so would not be an undue financial burden to the licence issuing authority to process these.

Question 5: *Do you agree that WT Act licence exemption for radio amateurs is not currently practical?*

Agreed, the effect of the WT Act is to provide valuable internationally accepted safeguards regarding ability, knowledge and conformance with recognised standards. Under no circumstances should the issuing of a licence be merely a matter of applying for one without production of evidence of basic knowledge.

Question 6: *What are your views regarding the possibility of WT Act licence exemption for radio amateurs in the longer term?*

This should be **never** be considered and would be seen as the de-regulation of the amateur radio hobby and therefore probably it's end. There would be severe implications to international agreements and would prevent UK amateurs operating abroad. It would also result in a large number of inexperienced operators who would not only interfere with the operations of genuine radio amateurs but would bring the hobby into disrepute and possibly cause the loss of many privileges as complaints from other spectrum users multiply.

Interference well outside recognised amateur frequency allocations can easily be caused by poor operation, not to mention deliberate out-of-band operation.

Recent experience during the 1980's with the introduction of 27/81 Citizen's band demonstrated the need for tighter regulation to be applied than had originally been envisaged.

WT Act exemption would be detrimental; we are proud of our licences and have worked hard to obtain them. We are responsible and accountable and wish to remain so. The current regime works well and tends to be self-policing.

Question 7: *Is maintaining the existing licensing regime but with an extended renewal period your preferred option? If so, please state the renewal period that you believe would be appropriate and explain why.*

No. we agree with Ofcom's assessment. The difference between an "extended period" and "life" is small. We note that driving licences are valid up to age 70 (virtually "life") barring health problems so no reason why amateur licences could not be "for life". We further suggest that if an amateur has been found non-compliant with requirements he/she should undergo re-examination as is the case with the driving licence breaches.

Question 8: *Do you agree that the current licensing system is over-burdensome? If not, please explain why.*

Yes. A free licence would remove this burden altogether.

Question 9: *Do you agree with the proposal to apply an administrative charge when processing applications for a Notice of Variation to an amateur radio licence? If not, please explain why.*

This depends on how much work is involved for Ofcom. The RSGB could, as it does now in most cases, apply a filtering process and on its recommendation the issue of an NOV would become almost automatic. In this case, it would be logical for NOV's to be issued free. Otherwise, if the nature of the NOV required further consultation then a fee might be appropriate. Please note that much pioneering work is done by radio amateurs, whose unpaid efforts benefit us all. If the issuing of NOV's could be done without charge it would be an encouragement for more pioneering work.

Any other Comments

As such, the proposal is welcomed, as long as there is no danger that technical requirements are reduced under the excuse that "funding is no longer available" or similar. We would also like to see a link between the licensing database and the examination database to ensure the authenticity and identity of new applicants applying for an amateur radio licence.

Ray Howells G4FFY
Hon. Secretary SRCC

3rd August 2005