

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Consultation on a proposal to reform amateur radio licensing (Of 243)

To (Ofcom contact): Amateur Radio Licensing, amateurradio@ofcom.org.uk
Ofcom, Riverside House,
2a Southwark Bridge Road, London SE1 9HA

Name of respondent: Murray Niman G6JYB, MIEE, (UKuG Committee Member)

Representing (organisation): UK Microwave Group

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing Name/address/contact details/job title

Whole response Organisation

Part of the response If there is no separate annex, which parts?

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes No

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and I authorise Ofcom to make use of the information in this response to meet its legal requirements. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom can publish my response: on receipt once the consultation ends

Name *Murray Niman*

Signed (if hard copy)



UK Microwave Group Response to Ofcom Proposal to Reform Amateur Radio Licensing (Of 243)

Submitted 17-August-2005

1. Who We Are

The UK Microwave Group (UKuG, www.microwavers.org) is the representative body specifically for UK amateur radio enthusiasts who operate on the microwave bands. It is affiliated to the Radio Society of Great Britain (RSGB, www.rsgb.org) and the RSGB Spectrum Forum. UKuG also closely liaise with AMSAT-UK and BATC who are also users of UK Amateur Microwave allocations. This response is intended to complement and in no way replaces the RSGB response.

UK Microwave Group membership includes operators of Terrestrial, Amateur Satellite and Earth-Moon-Earth (EME) links, using a variety of leading edge weak signal receivers. Systems also include Microwave Propagation Beacons, Voice Repeaters and Fast-Scan Television Repeaters. Our membership base includes many people with professional backgrounds and extensive experience in science, engineering and communications, who have contributed to this response.

In all amateur microwave allocations, our members and other Amateurs will have invested years of their own time and effort in the development and implementation high performance equipment. Since commercial 'back boxes' simply don't exist at our frequencies, amateur microwave activity is based on self-training and construction to the very highest standards. Results of these endeavours are made freely available to the wider engineering community. Our members are thus true to the requirement and spirit of BR68 Paragraph 1(1).

2. UKuG Position Summary

- For this response we conducted a poll using the Ofcom questions on our Yahoo UKMicrowaves Reflector
- We have observed and defended increasing encroachment of Amateur allocations by Ofcom endorsed initiatives, along with falling resources for spectrum/interference management. This makes us sceptical about whether Ofcom wishes to see Amateurs 'prosper'.
- Our membership views with dismay any trend to de-regulation, as this would fundamentally undermine our ability for construction and operation at our frequencies, most commonly in shared bands.
- We consider the sample bias in the MORI survey unfair. Half the sample was Foundation licensees who are not permitted on microwave bands, so questions on whether they are UKuG members are nugatory, regardless of any re-weighting – similarly for other specialist groups such as Amsat-UK etc.
- We note many inputs have already received by Ofcom which show concern on Adobe-PDF based license certificates, and the lack of integration with the Exam system etc. Ofcom should realise that Amateurs passionately care about the callbook (i.e. the callsign database) to a far greater extent than for other types of licence class (such as Marine, CB etc). Any new system should offer high integrity compatible with international reciprocal requirements.
- Ofcom is requested to maintain a structured licensing system and a sympathetic attitude to the Amateur Services which have a key role in education, engineering-training, and emergency communications as well as recreation - and to support it with experienced staff.

3. Consultation Questions and Answers

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

YES – BUT NOT IN THE FORM CURRENTLY ENVISAGED

We agree that the current paper based system is needlessly wasteful. UKuG itself is largely run on an electronic basis. However Ofcom are currently proposing a system which in their own words will be less accurate, and have questionable security. Any new system must be capable of:-

- Assured electronic security
- High integrity and accuracy
- Verifiable Moves/Adds/Changes/Deletes (MACDs) caused by Exam Passes, Death, moving home, changing ISP/e-mail addresses etc. Modern Society is more mobile than ever.
- Compatibility with callsigns for Clubs, Repeaters, Beacons, Special Events, Prefixes, etc
- International Recognition by ITU, CEPT, IARU etc and those who demand Paper Certificates.
- Fulfilling e-Accessibility/Disability Act requirements
- Making allowance for those unable/uncomfortable with online transactions

Any new system must engender confidence from its users – and not just be a convenience for Ofcom!

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.*

Ofcom admits that this will undoubtedly lead to erosion of accuracy of the callsign database. It removes the current fairly automatic mechanism to keep details up-to-date, which also reminds licensees of their privileges and responsibilities. A lifetime system does not get cleaned out by natural churn as at present and thus ceases to be a useful indicator of radio amateur activity. The current system at least gives some indication of those interested in maintaining their interest in Amateur Radio.

An option should be incorporated for licensees who lose interest entirely to have their entries (securely) removed from the database. A provision for Deletion/Removal of a licence should be included for those found guilty of abuse of their licence conditions.

A lifetime licence may also undermine introduction of incentives for encouraging Foundation class licensees to upgrade to Intermediate/Full where they would have Microwave Operating Privileges.

Free lifetime licences are not fully compatible with Professor Martin Caves Spectrum Audit - see “Emerging Issues”, 7th July-2005, Sec-6.3 Aeronautical, Sec-8.3 Marine etc

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

In the past there has been no demand from Amateurs for this. We are not convinced of the case for it and are concerned of a potential loss of status and influence. At present presumably a proportion of the license fee funds enforcement activity and participation in international fora.

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.

YES – However any charges should be at a nominal level and not be prohibitive or considered discriminatory.

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

YES, ABSOLUTELY- The Amateur Service and Amateur Satellite Service are defined as full services under the International Radio Regulations (unlike CB etc). Licence exemption will disenfranchise amateurs, their privileges and their ability to self-train/experiment.

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

NOT NOW, NOT EVER - This is neither practical nor desirable and would inevitably diminish and fatally injure the status and privileges of the Amateur Services. In shared/microwave allocations, this would inevitably lead to us being evicted as we do not envisage MoD, CAA, Commercial Operators etc willing to share with unregulated services. **Our membership poll was emphatic in this regard.**

If this occurred the amateur services would be limited to “type-approved” equipment of commercial origin and probably very limited (low) power.

It would destroy the most important experimental element of amateur radio - the ability to self-design and construct equipment, which is otherwise unobtainable in the commercial market (which is especially true for the bands above 1GHz).

It would close down the UK Amateur Satellite and TV fraternity at a stroke!

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.

YES – Our membership poll was in favour of this. Note that we assume some form of electronic modernisation is introduced, but one which satisfies our criteria in answer to Q1. A period of 5 years is acceptable. This would be a far less radical and lower risk change.

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

NOT according to our membership poll – To maintain standards there has to be an examination system, operating regulations etc which is largely accepted. Most amateurs have little complaint about renewing their licence (and many find it convenient with the direct debit system). We suspect that this question is more about Ofcom trying to justify its own cost-cutting exercise, and not respecting the best interests of 63000 stakeholders. Any new system would be less burdensome if it was largely electronic.

BR68 could be simplified though, for which UKuG would be pleased to enter into discussions.

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.

NOT ENTIRELY – The microwave community heavily relies on volunteer effort and infrastructure from its Beacon network, Repeaters etc. These provide a wider public service with no real means of recovering their costs. Whilst a modest charge for initial spectrum clearance could be considered, it would be unfair for this to become an annual tax per callsign/frequency for fixed beacons/repeaters.

We do not have a problem for NoV charges for one-off special events etc and to deter other frivolous requests.

Any charges must be nominal ones so as not to be unduly burdensome and prevent experimentation. The lack of charge details in the consultation does not aid assessment or transparency.

A web-based e-NoV system should be developed in collaboration with the RSGB for efficient low cost handling.

4. IMPACT ASSESSMENT

We are aware that Ofcom's 'Better Policy Making' consultation has recently concluded and has resulted in changes to the impact assessment process. The policy has been revised as follows:-

5.13 When identifying the possible options, we will generally start by considering the option of not changing the regulatory framework, either by not introducing regulation or by retaining existing regulation. This option – no new intervention – will be the benchmark or base case against which other options will be judged

This new policy is effective from August 1st 2005, and so UKuG requests that Ofcom consider the above and revise its Impact Assessment prior to publishing its conclusions. In particular the fact the status quo is now the benchmark means that a higher priority should be given to the current system or less radical changes.