



RSGB Response to Ofcom's Wireless Telegraphy Act Fee Proposals for encouraging on-line licensing

Submitted 15th May 2006

1. Who we are

The Radio Society of Great Britain (RSGB) is the national organisation for Amateur Radio licence holders in the United Kingdom with a current membership of 23,000 licensed amateurs. Formed in 1913 it was a founder member of the International Amateur Radio Union and continues to be a major influence for policy matters within that organisation. In addition to representing the interests of its members the views of non-members are also taken into consideration where major policy matters are involved.

2. Amateur Radio Licensing

2.1 In drafting the response to this consultation the RSGB has taken into consideration the detailed proposals suggested by Ofcom, together with the opinions of our members, many of who replied in detail to the consultation on Future Amateur Radio Licensing. The RSGB is disappointed that little notice has apparently been taken of the views of the many respondents who indicated that they wished to continue paying for what they consider the privilege of holding amateur radio licences.

2.2 In considering ship radio licences and amateur radio licences together a fundamental error has been made, probably based purely on licence cost. The philosophies however are completely different. The ship licence is primarily used for the safety of life and is normally allocated to a vessel. In the case of the Short Range Certificate for portable equipment this is obtained following an 8 hour course and a pass in a short examination. It is a necessity where maritime safety is concerned. The amateur radio licence on the other hand is a means to allow operations within the Amateur Services that are defined by the Radio Regulations as

1.56 *amateur service:* A radiocommunication service for the purpose of self-training, intercommunication and technical investigations carried out by amateurs, that is, by duly authorized persons interested in radio technique solely with a personal aim and without pecuniary interest.

1.57 *amateur-satellite service:* A radiocommunication service using space stations on earth *satellites* for the same purposes as those of the *amateur service*.

The emphasis should be placed on the statement “for the purpose of self-training” and this is achieved through the system of progressive amateur radio examinations that are administered by the RSGB on behalf of the Radio Communications Foundation. For the younger person the gaining of an amateur radio qualification can also lead to a career in radio communications engineering, an expertise that is acknowledged to be lacking both within the UK and the rest of Europe and a source

of major concern to industry. There is value in qualifying and holding an amateur radio licence and it is the feeling of a great number of UK licencees that their efforts and achievements are being devalued by the proposed removal of fees.

3. Notices of Variation

3.1 Charges for Internet Gateway and Repeater NoVs were introduced as a form of spectrum management. If these were not managed, under the new licensing arrangements radio amateurs could obtain NoVs that in theory would allow access to one or more of the limited number of channels permitted for these activities and effectively block access for other amateurs in their geographical area for a minimum period of five years. Under the current system, these NoVs are renewable on an annual basis giving the opportunity to release frequencies not being used in certain geographical areas to other radio amateurs willing to provide these services. Specialist committees of the RSGB currently coordinate Internet Gateway and Repeater applications on behalf of Ofcom and at no cost but it is not inconceivable that permitting the issue of these NoVs tied to the new lifetime licence will put considerable strain on what is a voluntary service. This could well result in the work being returned to Ofcom with an increasing workload and cost implication. The whole topic of these specialist NoVs needs to be taken back to the table for further discussion.

4. Discrimination

4.1 The RSGB remains of the opinion, bearing in mind the age profile of UK radio amateurs, that charging a fee for a paper licence and not charging for an application made via the internet is discriminatory and that cost implications should not be factored into the equation. The licence should either be free to all applicants, or as covered in paragraph 2 a fee should be charged.

5. Conclusion

5.1 The RSGB does not agree that the removal of fees for the Amateur Radio Licence issued by whatever means will be beneficial to the licensees. We do however support the objectives of licence simplification and are willing to work with Ofcom in order to meet this objective