



Ofcom Notice:

**General notice of proposal to vary amateur radio licences**

## **Response by the Radio Society of Great Britain**

**January, 2024**

The Radio Society of Great Britain (RSGB, [www.rsgb.org](http://www.rsgb.org)) provides our response and comments related to this next step in the process towards the new Ofcom amateur licensing framework.

As with our previous contributions, our 'representation' to Ofcom has been developed within the RSGB Spectrum Forum where we have been able to draw on a wide range of both internal RSGB experts, as well as a variety of external Special Interest Group representatives who are also members; and other feedback we have received.

We note that the previous consultation saw a significant response and some detailed changes, setting general policy; so our focus here has been some finer details and consequential.

Whether it is this response, or related matters, we welcome further engagement.

*RSGB, January-2024*

### **Geographic Boundaries (Condition-4)**

In the current draft, whilst Condition-4 clearly refers to the UK territorial/airspace limits, it does not cover operation beyond, in international waters etc. The old licence had specific provisions for this and we believe this needs to be covered in the new draft for such maritime and airborne usage.

### **Transmissions/Identification (Condition-6)**

It may be appropriate that either Guidance, or Clause-21 on Identification, may need to be more explicit regarding the need to be 'clearly identifiable' with respect to Beacons, Repeaters, Gateways and Data Stations.

### **'NoV' Systems & Guidance (largely Condition-6)**

Whilst we are content with the basic definitions associated with Beacons, Gateways, Repeaters and Data Stations, their direct incorporation into the licence is novel for UK amateur radio and can lead to perceived difficulties or ambiguities, compared to the previous 'NoV' approach.

We caution that any further changes to the definitions may inadvertently create new ambiguities or overlaps at this late stage in the process. Whilst we are aware of a few use cases where hardware is configured in an unusual way, it may be more appropriate to treat the application within another existing category.

In our original consultation input to Question-16, we also commented that having these uses in one relatively large section that starts with broader remote control and unattended usage might impede understanding - and we again ask that some editorials/formatting is considered to assist with that.

More substantially, we believe the way forward is largely based on updates to Guidance and where appropriate the Coordination Notice (and related arrangements), but are concerned that some measures may take time compared to the February licence variation taking effect.

As Ofcom is aware, this area is of keen interest to RSGB-ETCC and has also generated some wider concerns (such as 'talk-thru' systems) - where we will be pleased to engage further.

### **Coordination Notice**

Further to the above we appreciate the move to the new format Coordination Notice that replaces Schedule-2, but wish to clarify some aspects not covered in its first draft:-

- That secondary amateur allocations not mentioned in the coordination notice are indeed subject to a lighter process. For example this might facilitate further innovative low-VHF RB-DATV, or foster low-crossband usage between ~51.5MHz and 70.4MHz.
- There is no minimum power threshold for the bands specified. It would be useful to indicate the power levels below which full frequency clearance and coordination were not required. Otherwise this could be particularly onerous in 430-440MHz where numerous systems (especially Gateways) are below 5W erp; and in the case of Hotspots (effectively a form of gateway) as low as 10-100mW - similar to some exempt short range device powers.
- We would also appreciate some clarity on whether the new Data Systems category which is not currently mentioned in the Coordination Notice might be in scope, or not (eg in 430MHz) – noting that these and the Notice itself evolved at a later stage.

More broadly, as Ofcom are aware, we are keen to get to an updated, efficient and clear framework for callsign and coordination processes and welcome further engagement.

## Frequency Schedule

### 1850-2000 kHz

Both RSGB and affiliated groups again wish to highlight the somewhat impractical and overly-restrictive 32W power limit in this allocation (often termed Top Band or 160m).

For equipment and other reasons, we do not believe that 32W is a practical power level for this upper section of the 1.8 MHz band and request this be re-considered.

Whilst we acknowledge the secondary nature of the allocation, we again highlight:

- a) 32W is an unusual power limit to accurately verify on common amateur equipment
- b) It is not in the spirit of other UK (more sensitive) secondary allocations which will now be better aligned to 100W equipment powers
- c) It would leave UK amateurs increasingly disadvantaged behind a number of CEPT countries who now have either fulltime or special contest powers in the 100W to 1.5kW range (and Amateurs in ITU Region-2 & 3 where this section is Amateur co-Primary)

### 5 MHz Editorial Issues

Ofcom will be aware that early versions of the Statement and Notice had omitted the upper 5403.5-5406.5 kHz segment and had punctuation issues of kHz vs MHz. Whilst we have observed some document updates, there remains a number of editorial issues in both documents for 5MHz.

### 5MHz – WRC-15 Segment

We believe that there may still be an opportunity to access the full WRC-15 segment (5351.5-5366.5 kHz) where two small gaps of a few kilohertz are currently impeding us and cause operating difficulties. We ask Ofcom to explore this again with the Primary User, given the burden in implementing a future variation of the frequency schedule once the current proposals come into force. We would be pleased to discuss the matter and any permutations that may arise.

## General Matters

On broader matters we take the opportunity to mention the following that are already arising:-

### Intermediate Callsigns

As expected, we are already seeing positive interest in the new M8 & M9 series. We look forward to further information on their availability, both for new exam passes, and for those who wish to change from their current 2-series callsign.

### 'Special' Special Event Stations (SSES)

In a similar manner to the new Intermediate callsigns, any update to the timing of introducing more relaxed criteria for the longer/merged Special-SES callsigns would be appreciated.

### Exam Syllabus

We are preparing updates to the syllabus and associated resources that account for the change to the licence. This is a significant exercise, where we welcome further liaison.