



Ofcom Consultation:

Updating the amateur radio licensing framework

Response by the Radio Society of Great Britain

September, 2023

The Radio Society of Great Britain (RSGB, www.rsgb.org) provides our response and comments related to the Ofcom amateur licensing consultation.

We have structured it with answers and comments for the main questions, but supplemented it by a more extensive separate **Annex document** related to Q17 – the draft terms and conditions.

Our response 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.

RSGB has used online and social media to enhance awareness of this important consultation to all UK Amateurs. We also have three popular videos on YouTube, and have also held a series of internal sessions with Spectrum Forum, ETCC, Exams, Contests, Regional Teams.

The wide scope of the Ofcom consultation and our own engagement inevitably did not lead to a perfect consensus, but has enabled us to develop a detailed set of responses to questions where there is often complexity in the detail.

We also note that depending on the final outcome there would also need to be a clear communications strategy (given changes may be in phases) and major revisions to guidance and the exam system.

Whether it is our response, or future communications / logistics, we welcome further engagement.

RSGB, September-2023

Explanatory Note:

In line with the Ofcom consultation response template, which first requires a Yes or No answer, we have often used an initial approach of 'No' in order to draw attention to our explanatory comments, particularly where several issues are involved.

Question 1: Do you agree with our proposal that each licensee should only be able to hold one personal licence? Do you have any other comments on this proposal?

Yes, but see our comments - Whilst we agree in principle, we have a number of comments and note that this is also related to our answer to Question-7.

The single-call concept for individual amateurs had previously been around for many years until the end of the former 'BR68 regime'; and then in 2006 started to diverge under the current lifetime licence. Consequently there has been over 15 years and thousands of potential cases in scope of being affected by reverting to past practice.

We believe there are a number of distinct scenarios. Of these, this one is the clearest and closest for this particular question:-

- We support automatic revocation of lower licences as a licensee progresses up the licence levels on an exam pass - this just needs a clearly notified implementation date

We also note there are other categories:-

- A significant number of M3 licences issued to existing Full (Class-B) licensees in the 2000-2003 period for 10W HF access. These were issued against a simple Morse assessment (and no exam) - until the requirement for Morse was removed July-2003
- Longer established Licensees who may be holding lower-level calls from exam passes
- The need for a fair opportunity to choose which (typically) Full licence may be retained for those cases where more than one Full licence is held at the same level (due to Class-A/ Class B historical reasons)

We note that Ofcom refer to Phase-3 of their timeline, but we are open to discussions regarding a clear implementation date and associated logistics.

For example, we are not opposed to automatic revocation being implemented relatively early for new exam passes.

Question 2: Do you agree with our proposals to permit greater supervised use of the radio equipment by others? Do you have any other comments on this proposal?

Yes – and... We agree and believe this offers great opportunities to promote and demonstrate amateur radio, attract new participants, as well as facilitating on-air training

Question 3: Do you agree with our proposal to use M8 and M9 for Intermediate licensees going forward? Do you have any other comments on this proposal?

Yes - but see our comments We agree and believe there is strong support for this from most Intermediate licensees. However we have some concerns regarding implementation and existing 2-series holders.

We suspect there could be potentially high initial demand for existing Intermediates to change to an M8 or M9. In many, but not all cases, they will want the equivalent three-letters.

We note Ofcom's indication that there is a 3-year time limit to the reservation period for call sign matching characters (ie 2Exyz maps to M8xyz). We have a view that a lengthy drawn out

changeover period is not in the interest of UK amateur radio, or the individuals concerned. Therefore we advocate an optional but proactive process, so that say in 5(?) years' time any remaining 2-series licences could be formally varied/retired, simplifying UK amateur licensing.

Given that Ofcom indicates there are ~13000 2-series call signs currently in issue, it would represent a logistical challenge unless some specific steps are put in place by Ofcom

We note the overall total may be assisted by the revocation of redundant Intermediate calls, if the individuals concerned have since become a Full Licensee (or sadly a silent key).

Question 4: Do you agree with our proposals to change our policies on the use of RSLs? Do you have any other comments on this proposal?

No - not as proposed. RSGB has a wide membership base and consequently we do not have full consensus on this. Generally speaking more established amateurs may prefer the status quo, compared to newer entrants and emerging equipment.

We thus draw Ofcom's attention to what we believe is the most sensitive topic of the overall consultation, particularly for amateurs in the Nations & Crown Dependencies – who often view this in terms of their 'identity' – rather than narrower regulatory, technical or operating terms.

Having seen various concerns, but also noting there are several detailed aspects, we provide the following comments:-

Justification: Whilst accepting that RSLs are not an ITU requirement (except for 2-series Intermediates) – it is still within Ofcom's remit to specify them; or to better justify such a change from their current long-standing mandatory basis for individuals, to a largely optional basis

General RSL Definitions:

- Regardless of the final approach, we attach great importance to retaining clear RSL definitions for the Nations and Crown Dependencies within the licence. Such clarity is vital for their recognition in order to minimise international impact on amateur radio (such as DXCC etc) – for both individual and club RSLs
- As Ofcom may be aware, the Welsh RSLs (W & C) have been accidentally omitted in the draft licence, which needs an editorial correction

'E' RSL:

- We support the opportunity for wider optional use of 'E' (as in GENxxx and MENxxx)
- However, we strongly oppose any suggestion by a few amateurs that 'E' should be compulsory for English amateurs

Other RSLs:

- We do support the new provision for Celebratory RSLs being more easily implemented by simple web notice, rather than the self-service NoV that RSGB can provide
- We do not support requests by a few respondents for additional geographical RSLs (even if optional)

Contests/Awards: Should Ofcom proceed with optional RSLs, the RSGB Contest Committee(s) have already considered this. Relatively few contests are dependent on RSLs. However some distance / firsts awards can be. Our internal considerations suggest that it would be fairly straightforward to adjust the relevant award rules/criteria, so such as change is considered to be manageable at the operating level.

Other Aspects: We note there may be benefits for ‘Data Stations’, APRS-telemetry and digital mobile usage where callsigns may be embedded in the transmission; and where non-mandatory RSL usage would simplify implementations when crossing borders.

In summary, the greatest concern on this question is the sensitivity around ‘identity’ in the Nations and CDs – and why there is a need to change. Thus Ofcom should consider this carefully, including in its impact assessment.

Question 5: Do you agree with our proposals to allow the use of any suffix? Do you have any other comments on this proposal?

No, not as proposed. We largely agree, given that suffixes are largely optional already. However we have seen some concerns regarding some free-form suffixes having the potential for confusion or abuse.

We believe there is a good case for some specific guidance to ensure the ongoing licence requirements to be clearly identifiable (avoiding some international country identifiers) and to be non-offensive

For example M0xyz/ZL would appear to be okay under the Ofcom proposal, but also may (mis)represent a UK amateur located in New Zealand

There may also be a good case for say a 12-character suffix limit to avoid bad practice. Our Annex on detailed terms includes suggestions for adding safeguards to the licence clause

Question 6: Do you agree with our proposals to allow a change of call signs? Do you have any other comments on this proposal?

No, not as proposed. Whilst we are somewhat sceptical regarding the demand for this, we strongly believe that a two-year period is too short and (save for exceptional circumstances) and advocate this is on the same 5-year period, perhaps aligned to the validation anniversary

We note Ofcom prefer a single time period for all circumstances and this may be problematic. It also represents a landmark change from the previous practice of callsigns not normally being re-issued.

For example 2 years would be too short to protect a silent key call sign from going back into the general usage pool. It would be better for a five year period to avoid confusing churn and reduce workload, but with sufficient provision for exceptional issues (medical grounds, IT errors and permitting a licensed family member to inherit/adopt within that period)

Question 7: Do you agree with our proposals on the limits to how many call signs can be held? Do you have any other comments on this proposal?

Yes – but we have several comments

Individuals: As per our response in Question-1, we do support a carefully implemented return to a single licence for individuals, noting that the individual (or club) may still hold separate callsigns for SCCs, repeaters, gateways etc that do not count to the limits etc

Clubs: We agree that clubs should be able to hold up to say five calls, but in practice that is not how a club licence is structured. A club licence does not specify more than one callsign. An

individual may hold more than one (different) club call – but there is no way to tell if they are very distinct clubs, or just a means by the parent club to work around the rules (with sub-groups for contesting, historic reasons or whatever). Whatever the solution, the callsign limit should be specific to licences and not include additional calls such as repeater or gateway callsigns – which for example may penalise some Repeater Group club licences

Club Licence Criteria: This also raises a related issue - the criteria to apply for a Club licence. Currently this requires a manual process and three Full licensees. However we note that in school and university environments (areas where we are keen to develop new amateurs), finding three existing Full licensees to form and sustain a club can be very challenging.

We therefore look forward to engaging further with Ofcom regarding the Club licensing framework.

Question 8: Do you agree with our proposal to simplify special event call signs? Do you have any other comments on this proposal?

No - Not as currently drafted. We fully support the proposal to merge standard Special Event Station (SES) NoVs and Special-SES (SSES) into a more coherent approach and relax the former requirement for general public access.

Whilst not fully clear in the consultation document, please ensure that (except for GB3 and GB7 for beacons/repeaters), that longer variants such as GB30xx or GB75xxxx are available for such special event callsigns.

Time Periods: Where we do have a concern is the lack of clarity regarding the new time periods. What is important is that any solution supports the ability to have a recurring annual event and callsign with a clear expiry and 'inactivity' period ahead of it being re-applied for.

Therefore we propose a clearer approach in which a Special Event NoV is valid for 6 months, rather than a year. This would far more flexible than the current 28days, but more clearly be separate from the point where it may be re-applied a year later – along with a better defined safeguard (or resting) period (such as a year), before it can be applied for by other applicants.

The application process and associated guidance should also cover avoiding offensive words in the longer callsign format, being clearly identifiable etc.

Special Contest Calls (SCC) – We also believe there is an opportunity to consider changes to these - as covered in the RSGB Annex document.

Question 9: Do you agree with our proposals to increase transmit power? Do you have any other comments on this proposal?

Nominally Yes, but we do have some comments.

We have detailed comments in the Annex regarding the frequency schedule and power, but note here briefly that:-

It is important that there is also clear guidance that it is only Primary allocations where this is applicable for both Full 1kW power and low power aeronautical usage - as distinct from secondary allocations.

Foundation: We are aware that when considering commonly available VHF/UHF mobile equipment, that 25 Watts output is a common specification level. Whilst feeder and filtering losses may result in it being 20W at the antenna input, we are open to Ofcom slightly revising the proposed Foundation power level from 20 to 25W to provide better clarity and alignment.

1.8 MHz: For similar equipment and other reasons, we do not believe that 32W is a practical power level for the upper section of the 1.8 MHz (1850-2000kHz) and request this be 100W aligned with common HF radios, the Intermediate power level, and other secondary allocations.

Question 10: Do you agree with our proposed changes to remote control operation? Do you have any other comments on this proposal?

Yes - we agree – Enabling this for Foundation and Intermediate level is especially welcome and reflects our past requests, as well as technological advances. We note there are also conditions associated with identifying/labelling remote equipment and closedown times. Thus past guidance regarding adequately-secure fail-safe network links etc may need to be updated.

Question 11: Do you agree with our proposed changes to Beacon operation? Do you have any other comments on this proposal?

No - Not as currently drafted. There are a series of issues (mostly associated with Schedule-2) and we refer to our Annex for a clearer approach aligned with other Ofcom guidance

Question 12: Do you agree with our proposed changes to Gateways? Do you have any other comments on this proposal?

Yes, but see our comments... Whilst we recognise that many amateurs will welcome this change, we strongly advocate clear guidance, coordination and the ability to operate such low power (<5W erp) unattended in Secondary allocations (notably 430MHz) - which hitherto has been an impediment for low power gateways, but strangely not for higher power repeaters.

In this regard RSGB is prepared to provide a new online self-coordinating service to assist end-users.

Question 13: Do you agree with our proposed changes to Repeaters? Do you have any other comments on this proposal?

No – not as currently drafted – There needs to be explicit limits of 25W erp max and frequencies above 28MHz, in line with current NoVs - on both spectrum efficiency and international HF protection / coordination grounds. A small modification to the Repeater definition is also required so that it can more clearly incorporate non-simultaneous store/forward messaging and/or a small number of single-frequency TDD systems.

It also needs to be clear that RF network links on repeater inputs which currently are separate NoVs, require the repeater keepers permission.

More generally this still does not cover a wide variety of other data links/stations. So in the Annex, in addition to the above, we propose the terms for a new category of **Data Stations**.

Finally, as per our reply to Q12, RSGB is prepared to provide an information service and review band planning to cater for what is effectively a brand new low-power (5W erp) category, noting that this new class of usage should be segregated from the main repeater network to achieve spectrum efficiency and avoid potential chaos.

For information, RSGB-ETCC does not coordinate the smaller number of specialist systems used by RAYNET-UK, but we believe they can be accommodated in the new framework.

Question 14: Do you agree with our proposed changes to allow Foundation Licence holders to build their own equipment and access the 2.4 GHz and 5 GHz frequency bands? Do you have any other comments on this proposal?

No – not as currently drafted as there are a number of quite distinct matters:

- **Foundation construction changes** – We fully welcome Ofcom’s proposal
- **2.4/5GHz Access/Power** – We fully support the addition of these two bands to the Foundation licence, making it more attractive. Whilst the proposed 1W power level may be okay for terrestrial use, we also recognise the valuable role that the QO-100 Geostationary satellite transponder plays in promoting amateur radio – which has an uplink in the 2.4GHz amateur satellite service allocation. We believe a 1W input into an average antenna would be insufficient for such uplinks. Therefore we would support a somewhat higher power level such as 2W to facilitate that.
- **5GHz Spectrum Allocation** – Both for Foundation and other licensees, we believe UK amateurs are unfairly disadvantaged (uniquely in Europe) as we no longer have access to the full 5650-5850MHz secondary amateur service allocation. This is detailed further in the Annex, but restoring secondary amateur service access in the gaps at say 1-2W power would go a long way to address this, without risking undue interference. Thus Foundation would be 5650-5850 MHz at a uniform low power level, whilst higher licensees would also see two low power segments added to bridge the gaps, capable of supporting wider bandwidth better aligned data channels, greater compatibility with available equipment (and other users) and thus facilitate future innovation.

Question 15: Do you agree to Ofcom’s proposals to permit some limited airborne use?

Yes –we welcome this, but.... As per our detailed reply and Annex associated with Q11, we ask Ofcom to review and withdraw what we consider an over-protective and unnecessary restriction in Schedule-2 for the 144-146MHz amateur primary allocation near NGR TA 012869 (near Scarborough), so that low power airborne APRS telemetry on 144.8MHz can occur and facilitate flight tracking.

Question 16: Do you agree to Ofcom’s proposed changes in licence format and the alignment of standard terms and conditions?

No – not as currently drafted

Compared to Q17, we see this as largely editorial issue, but is important that it is clear to navigate for users not used to the format. In particular there could be greater clarity in the clause numbering/structure in the larger sections, notably Condition-6, which is quite lengthy and thus relatively hard to reference a particular use case.

Question 17: Do you agree to Ofcom’s proposed changes to the licence terms and conditions?

No – not as currently drafted

Please see the extensive RSGB Annex document where a series of detailed comments, amendments and additions are proposed for the new licence terms and conditions.



NOTE – Please see our Separate Annex Document with respect to more detailed comments and proposals for the Licence Terms and Conditions in answer to Q17