

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.

Ofcom Consultation:

Updating the amateur radio licensing framework

Annex on Proposed Terms & Conditions: Comments by the Radio Society of Great Britain

September 2023

The Radio Society of Great Britain (RSGB, www.rsgb.org) provides these detailed comments and proposals related to the Ofcom amateur licensing consultation, specifically on the draft licence terms on pages 68-93 that are referenced by Question-17 of the consultation.

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.

Summary

Briefly, we have identified issues with respect to:-

- Editorial errors
- Emergency usage / user-services definition
- Extra safeguards for repeaters
- Beacons - Updates and clarity with respect to Schedule-2 referencing
- Small changes to Beacon, Gateway and Repeater categories and definitions (especially to clarify the 25W erp limit)
- A new Category is proposed for 'Data Stations'; to accommodate systems that do not fit the three current draft categories – mainly data links/networks
- An opportunity to move nearly 300 SCC (Short Contest Calls) from an NoV mechanism to be more integrated (whilst fully preserving Ofcoms oversight)
- Frequency Schedule entries where we seek revisions: 1.8MHz, 5MHz, 2.4GHz, 5GHz
- A clearer Schedule-2 for Beacons

We hope the following is of assistance – and would be pleased to discuss further

RSGB, September-2023

ANNEX: Draft Licence - RSGB Comments & Proposals

Editorials:

Related to Q16: The new licence clauses are harder to uniquely reference due to major sub-sections (particularly within the long Condition-6) not numbered; and numbers being re-used at clause level. An easier to navigate numbering scheme or structure would be appreciated.

Typos: We have also noticed the following that require correction:-

- Condition-6 RSL table: Please correct the omission for Wales! W and C
- Condition-9, clause-4 title: Emergency **S**ituations (not **D**ituations)
- Frequency Schedule: Full Table-C: - typo on 1850-2000kHz - a missing zero

Condition-1 – Licence Term, Variation and Revocation

Clause 2f re 'Revalidation' only refers to Ofcom **potentially** revoking a licence if contact details are not confirmed after 5 years

We would appreciate a separate, clear but lighter clause to emphasise that Entitlement's to additional usage/callsigns/NoVs inc for repeaters etc **lapse automatically** after 5yrs (similar to their current NoV expiry) – as a safeguard/incentive to facilitate efficient management

Condition-5 – Coordination

This is a new clause that we are content with but requires guidance to explain/expand.

The referenced Ofcom Civil-Military Sharing document in Condoc Para-6.24 gives one example related to Schedule-2; and the Charing Cross radius in 431-432 MHz.

However there are other areas where coordination guidance needs to be more easily accessible; such as for Primary User frequency clearance and the conditions associated with 2.3 & 3.4GHz which date back to the April-2014 PSSR Statement.

Condition-6 Radio Equipment Use

Clause-7 – We support concerns that voluntary User Services and other government departments are no longer included due to change in the definition in the Condition-10 Interpretation section.

We believe it would be better to refer to the 'User Service' definition as used in the current licence, rather than just the proposed narrower 'Responder' definition:

"User Service" means the British Red Cross, St John Ambulance, the St Andrew's Ambulance Association, the Royal Voluntary Service, the Salvation Army, any Government Department, any 'Category 1' responder, and any Category 2 responder as defined in the Civil Contingencies Act 2004;

Condition-6 General usage (ex NoV) Systems - Beacons, Repeaters, Gateways etc

We recognise the intent is to integrate the vast majority of systems that currently require NoVs.

Firstly we suggest the licence format would be clearer if the various subsections for those associated with such general use systems (eg Beacons, Gateways, Repeaters etc), are easier to reference, or in their own section.

More substantially:-

- Definition refinements are proposed for repeaters
- Greater clarity is proposed for Beacons and Schedule-2
- Some extra safeguards are sought
- **A new category of 'Data Systems' is needed and proposed**

Definitions from Condition-10 Interpretation

Currently there are three categories, based on:-

- “Gateway” means radio equipment that transmits and receives on a **single** frequency.
- “Repeater” means Radio Equipment that is capable of **simultaneous** reception and re-transmission on **different** frequencies.
- “Radio Beacon” means **automatic** transmitting-only Radio Equipment which is operated by the Licensee for the purposes of the purpose of determining radio propagation characteristics; position reporting; direction finding or other telemetry.

Whilst the above does cover the majority of the ~1200 NoVs in scope¹, it does leave a significant number where we need to more flexibly cover other permutations such as store/forward and Time-duplexed (TDD) repeaters, and a wide variety of data/feeder links, RF networks/mesh transceive

We believe this is best addressed by both a small modification of the Repeater definition; and a new fourth category and definition to flexibly cover a variety of current/emerging data systems that don't fit well with the three current categories.

Repeater Definition Update

We propose the following changes to the repeater definition accommodate non-simultaneous (eg store/forward delayed or 'parrot') usage; and potentially single frequency TDD repeaters (which DMR is capable of)

- z) “Repeater” means Radio Equipment that is capable of **simultaneous** reception and re-transmission, **typically** on different frequencies.

Beacons/Repeaters

Ofcom should clarify, perhaps in guidance, Clause 12 & 14 re **Full (Temporary Reciprocal)** – as that specific licence class is perceived to be riskier and harder to contact/manage – and is only valid for six months or so.

¹ RSGB-ETCC Stats have ~1250 callsigns/NoVs in scope, including ~220 Data systems (APRS-Tx/Rx, Packet and other links) which do not fit the current Repeater, Gateway & Beacon categories

Radio Beacons operation (and Schedule-2 reference)

11a (which includes the <5Werp category) needs to just refer to **restrictions** in Schedule-2, to protect designated locations, as per old licence 10(1); - not at only bands/locations. Furthermore we request Ofcom consider a waiver from those restrictions if beacons are <5W erp

The wording (and/or guidance) should be clear this is only for automatic general reception (so it does not accidentally restrict normal personal/attended usage) - and see later for a clarified Schedule-2.

12 Beacon Power Limit: (for the 5-25W erp range) Add into **12** (where this is a Full licence etc):

Radio Beacon Stations may operate up to a maximum power level of 25 W erp.

Comments:

- Having the power limit in the main condition is clearer, instead of it lurking in Schedule-2
- We note that 11b covers the 2hr closedown that was referred to in Schedule-2
- For the modest number of beacons >25W erp -= they would stay within the NoV regime

Repeaters

Safeguards on frequencies and maximum power are requested to reflect current arrangements:

We propose adding:

14 f) must use frequencies above 28MHz

15 f) ensures that the Repeater transmits at powers no greater than 25 Watts ERP

There is also another condition which we wish to be considered to be included, which at present is managed by separate NoV in order to prevent problems:-

- Anyone wishing to establish an on-air RF gateway link to a Repeater must have the permission of the Repeater keeper

With respect to Primary User Coordination (related to Condition-5), we would welcome the existence of pre-cleared gateway and repeater channels on secondary bands (especially in 430-440 MHz) and would encourage dialogue with the primary user/s with a view to achieving this.

Explanatory comments

- The above more clearly defines the <5W and 5-25W erp beacon and repeater power categories, noting that RSGB-ETCC do not authorise any repeaters above 25W erp to assist with both spectrum efficiency and as the majority are in secondary allocations.
- The Repeater definition update accommodates, more specialist cases (those repeater which may store and forward messages, and some limited use of TDD single frequency systems)

- A modest number of Beacons above 25W erp would remain fully coordinated under NoVs
- RSGB welcomes the opportunities afforded by the new <5W repeaters category and will consider appropriate band planning and guidance for them
- Note: Currently RAYNET repeaters are outside of the current NoV regime (as they are not fully general usage, or in ETCC data). Some of these may need to be better registered/coordinated - but our view is that that this could be catered for without further licence modifications

Data Systems

To cover the wide variety of other (largely M2M) data systems that ETCC currently coordinate, we propose one new category, but with a flexible definition that Guidance can expand upon.

Such a new category could then cover APRS-Tx/Rx, UIView/Packet, data/trunk links, RF mesh networks; and emerging technologies such as adaptation of LoRa or whatever...

We therefore suggest adding the following:-

Radio data station operation

NN. The Radio Equipment may be used as a Data Station and may be operated (but not controlled) by other radio amateurs without supervision, providing that the Licensee:

- a) Ensures that the **Data Station** transmits at powers no greater than 5 Watts ERP;
- b) is able to demonstrate that reasonable steps have been taken to minimise the risk of the **Data Station** causing undue interference to other authorised uses of radio and provide evidence of this if requested by Ofcom;
- c) takes all reasonable steps to ensure that the **Data Station** is only used by an Amateur;
- d) remains responsible for the operation of the **Data Station** and compliance with the terms, conditions and limitations of the Licence; and
- e) is able to close down the **Data Station** within two hours of being required to do so by Ofcom.

NN. Where this is a **Intermediate, Full, Full (Club) or Full (Temporary Reciprocal)** Licence, the Radio Equipment may be used as a **Data Station** at powers greater than 5 Watts ERP, providing that the Licensee:

- a) ensures that the **Data Station** is identified using the call sign allocated and published by the Radio Society of Great Britain or any other body stipulated by Ofcom for that purpose; and
- b) is able to demonstrate that reasonable steps have been taken to minimise the risk of the **Data Station** causing undue interference to other authorised uses of radio and provide evidence of this if requested by Ofcom.
- c) takes all reasonable steps to ensure that the **Data Station** is only used by an Amateur;
- d) remains responsible for the operation of the **Data Station** and compliance with the terms, conditions and limitations of the Licence; and
- e) is able to close down the **Data Station** within two hours of being required to do so by Ofcom,
- f) ensures that the **Data Station** transmits at powers no greater than 25W erp.

Data Station Definition: Our proposed simple definition for the Interpretation section is:

“Data Station” means radio equipment that transmits or receives data

Data Station notes:

- The ‘Data Station’ definition has been kept simple and thus should be flexible and fairly future proof, given some accompanying guidance – and would thus cover the ~200 under NoV
- For example – ‘Data’ is a broad term and thus can potentially include analogue or digital data
- Note that 5-25W range would now be open to Intermediates (currently limited to Fulls)

Callsigns:

currently GB3, GB7, MB6 and MB7 are used for the various NoVs. We would welcome a discussion with Ofcom regarding additional MB series (or equivalent) to help more clearly identify the different classes of systems

Other NoVs - SCCs

SCCs (Short Contest Calls) – Nearly 300 are in issue out of 520 capacity, managed by the RSGB Contest Support Committee in liaison with Ofcom Policy specialists. As per below the NoV needs a modest change, or we could use this opportunity to more fully incorporated into the licence:

If the NoV approach is retained – updates are requested as follows:-

- There is one clarification to the meaning of a contest ‘section’ that has been discussed and agreed with Ofcom (as a result of someone asking a question that hadn’t come up previously that had to be forwarded to Ofcom for a decision). This change has been previously drafted and approved, but not yet implemented
- Another change we would really like to see is to delete the phrase “Ofcom will also consider results from other contests, not listed in Table 1.....” as this will make the decision process a straightforward yes/no decision.

Alternatively - we could incorporate into the licence, based on adding a new clause:-

Where this is a Full or Full (Club) Licence, the Radio Equipment may be identified using a “Special Contest Call Sign” (SCC) provided that:

- *The licensee satisfies the **Ofcom-agreed** qualification criteria for such a call sign to be issued and used*
- *The Special Contest Call Sign (SCC) may only be used to identify the station when the station is participating in an Amateur Radio Contest of no more than 48 hours in duration and run by a bona fide contest organiser,*
- *ensures that the Radio Equipment is identified using the SCC allocated and published by the Radio Society of Great Britain or any other body stipulated by Ofcom for that purpose;*
- *and noting that the SCC may be enhanced using one of the RSLs specified by this licence*

Notes:

Incorporation does not change in any way Ofcom's ability to manage or set criteria, but could usefully contribute to a reduction in overall 'NoV' numbers and ease burden on policy experts.

A clear maximum duration (eg 48hrs) is important as it prevents the SCC from being used all of the time as your primary callsign by claiming you are competing in a year-long marathon radio event.

Condition-6 Identification

As previously noted the RSLs for Wales (W & C) are missing in the table

There would need to be a change to Clause-19 if the personal RSLs remain mandated

Clause-23 regarding Suffixes may need modification to stress that any suffix should not offend, or confuse clear identification (and perhaps be limited in length)

Condition-9 EMF

There remains a concern that some of the language re 'shall' is actually referring to ICNIRP guidelines (which technically are not hard limits)

Clause 4: 'Emergency Situations' typo as previous indicated (not Dituations)

Condition 10 Interpretation

Based on comments above the definitions may need to be amended for Users Services, Repeaters and the a new 'Data Station' usage category

Main Frequency Schedule-1 comments:

Full Table-C: p87 - typo on 1850-2000kHz (Missing zero)
 – or else amateurs accidentally get lots of extra long/medium wave spectrum ☺

1.8MHz Band

- 1810-1850kHz amateurs are Primary in the ITU Radio Regs (thus up to 1kW)
- 1850-2000kHz Power limit – only 32W (vs 1kW in the Primary 1810-1850)

The 32W power limit in the Radio Regs is very restrictive (esp as the original PU systems are obsolete and no longer present), nor is it practical/aligned from an equipment view point. Contest use of 1.8MHz regularly spills over into 1850+

Other secondary bands are 40, 100, 160 or 400W power limits, **so we wish to propose 100W** secondary (inc the existing non-interference condition) – would align better (inc with equipment and new Intermediate power level and more recent practice on 5MHz

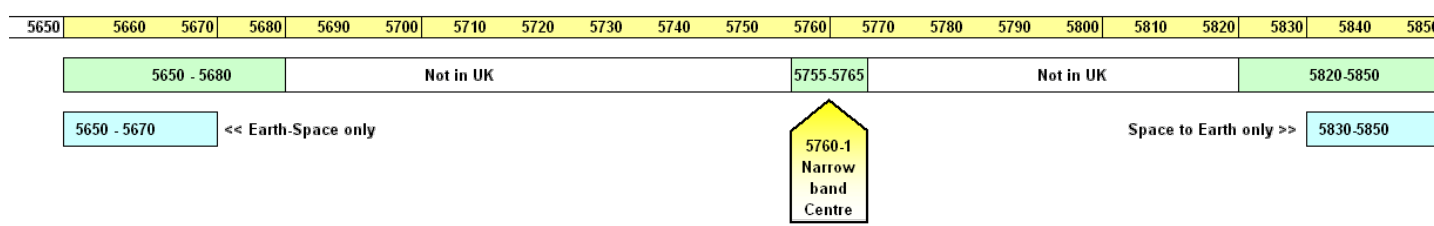
5MHz – UK Amateurs are deeply disappointed that years after an ITU allocation was agreed, that a couple of small sections of the 5351.5-5366.5kHz ITU secondary allocation remain inaccessible in the UK. Given that the band is widely allocated and used by our neighbouring amateurs and beyond, the refusal of the Primary User remains less logical than ever.

We take this opportunity to state that we are prepared to ‘trade’ and offer back over twice the amount of spectrum than is required for harmonising the gaps (aligned with our existing licence 5MHz conditions). If refused, we request that the PU publicly state their reasons for refusing such a rare/generous offer and not recognising the ITU allocation.

2.4 & 5GHz for Foundation – As per our reply to Q14, we are persuaded that slightly more power is needed for the 2.4GHz uplink to the QO-100 satellite. In our case we propose amending the 1W level into an antenna to 2W (whilst noting that AMSAT-UK and UK-Microwave Group also have views on this)

5GHz –General

The full ITU 5GHz band amateur secondary allocation is 5650-5850 MHz. This was fully available to UK amateurs until ~1981 – but you can see below that we are now quite restricted in the UK -





Other European countries do not have such a restriction for their amateurs. In France, Germany, Austria etc this has enabled longer fixed p-p amateur links such as 'Hamnet' amateur network, as well as shorter access links, mesh nets etc using wider bandwidth channels. Much of this is based on adapting standard wireless chipsets and equipment

A practical issue is now arising from these quite narrow UK amateur allocations in that their centre frequency/bandwidths no longer align with commercial chipsets which now use 40-160MHz wide channels (that ironically support more polite channel sharing protocols)
– making it increasing hard source/adapt suitable kit for use in 'amateur' mode

We propose that low power say 1-2W (similar to the new Foundation level ?) to fill in the gaps would cover this, without causing concern to other users

Considering other users, the upper gap 5765-5820 MHz may be easier to accommodate the change, if the lower gap is considered more of an issue

Schedule-2

Additional restrictions which apply to the Unattended Operation of Beacons

Comments/Considerations

- Can we be clearer that these only apply to unattended/automatic Beacon operation ?
- We only need to list locations/frequencies needing protection – thus we can have a simpler table without the licence class columns which are well defined in the main conditions
- We propose that the Beacon 25W erp power limit and closedown could move to the main condition clauses as it is similar to the main repeaters and the unattended clause
- Separately we invite Ofcom to consider if these restrictions applies to the lower risk <5W erp power levels, or just the 5-25W erp range
- A few rows/clauses of the original can be omitted as they relate to specific amateur usage only and not the locations – which is far better covered in the main licence. This also avoids accidentally restricting specific usage modes such as low power usage for WSPR, APRS, telemetry, milliwatt DF competition pingers etc

Consequently we propose a simpler and clearer schedule as follows:-

Unattended operation of Radio Beacon stations is subject to the following geographic restrictions:-

| Frequency | Location |
|--|--|
| 28.0 – 29.7 MHz | Not within 50 km of NGR SK 985640 |
| 144 - 146 MHz | Not within 50 km of NGR TA 012869* |
| 1298 – 1299 MHz | Not in N. Ireland** and not within 50 km of NGR SS 206127 and NGR SE 202577. |
| 2310.0 MHz - 2310.4125 MHz | Not within 50 km of NGR SS 206127 and NGR SE 202577. |
| 2392 MHz – 2450 MHz | Not within 50 km of NGR SS 206127 and NGR SE 202577. |
| 5670 MHz – 5680 MHz | Not within 50 km of NGR SS 206127 and NGR SE 202577. |
| 10.0 – 10.125 GHz | Not within 50 km of NGR SO 916223, SS 206127, NGR SK 985640 and NGR SE 202577. |
| 24.0 – 24.050 GHz | Not within 50 km of NGR SK 985640 and NGR SE 202577. |
| 47.0 – 47.2 GHz | Not within 50 km of NGR SK 985640 and NGR SE 202577. |
| Frequencies above 75.5 GHz that are listed in Schedule-1 | Not within 50 km of NGR SK 985640 and NGR SE 202577. |

* 144-146 MHz: As this is Amateur Primary we question this as over-protective versus any other amateur usage/power in the band – especially as it would also inhibit popular direction finding beacon telemetry on 144.8 MHz

** Please can Ofcom review if the 1298-1299MHz restriction still applies in Northern Ireland ? Our understanding is that the equipment has been decommissioned and it could be now be unfair and conflict with the draft WRC23 AI-9.1b recommendation which may endorse greater amateur usage in this frequency segment, versus other parts of the amateur allocation

ALSO: Another benefit of our proposal is that it is better aligned with the simpler list in the August-2022 Ofcom Civil-Military sharing document.

We also believe our approach also enables the elimination of the following text as it is being covered elsewhere or unnecessary:-

~~Notes to additional restrictions which apply to the unattended operation of beacons~~

~~(1) May only be used for the purpose of direction finding competitions. The Beacon must transmit the Callsign of the Licensee in accordance with Clause 13 of this Licence and it must be possible to switch the Beacon off within two hours of a demand to close down by a person authorised by Ofcom.~~

~~(2) It is permissible to transmit positional information using automatic position reporting software on a spot frequency of 144.800 MHz at any one temporary location not within 50 km of NGR TA 012869. The maximum permitted period of unattended operation is 30 minutes.~~

~~Notes to schedule 2~~

~~(a) The Unattended Operation of Beacons is only permitted within the frequency bands:~~

- ~~i. Which are listed in the first column of Schedule 2; or~~
- ~~ii. which are above 75500 MHz and are listed in the first column of Schedule 1 providing that such operation is not within 50 km of NGR SK 985640 and NGR SE 202577. (covered by adding that extra >75.5GHz line in the table)~~

(b) Beacons may operate with a maximum power level of 25 W e.r.p. pep.

(and is even clearer if this power limit clause is moved to main licence clause for beacons)

Notes:

- The other requirements regarding identification and 2-hour closure are already covered by other licence terms – thus the ability to significantly simplify the Schedule-2 notes
- Reference: “Frequency sharing arrangements between civil and military services”, UK Frequency Allocation Table, Ofcom 19-August-2022