

Question 1: Do you agree with Ofcom's proposal to exempt users of Citizen's Band (CB) radio (and other related applications such as Community Audio Distribution) from the need to possess a Wireless Telegraphy Licence.: I can only offer an opinion on the CB radio aspect, having no knowledge of the other systems in question.

Many years ago, I was heavily involved in the CB radio scene. I was the secretary of a club based in Manchester.

One pre-requisite of membership of the club, was that all members should hold a valid CB radio licence.

In my experience, the people who created problems on the CB radio band at the time were usually operating without a licence. The agency at the time responsible for the regulation of CB radio was the Department of Trade and Industry.

The DTI were however unable to effectively regulate CB radio due to lack of resource. Even in instances where troublemakers were identified to the DTI, they rarely pursued offenders. The most serious cases (violent threats and drug trafficking for instance) were usually referred to the local police with mixed results. I have no reason to think that current regulation arrangements are any more effective than they were then.

It appeared that the licencing scheme for CB radio was simply a revenue-generating exercise, providing no real benefit or protection for licence holders.

Today, the costs of maintaining a licencing scheme probably exceeds the revenue generated for several reasons; the price of a licence has remained unchanged for more than a decade; The user base of CB radio has been drastically reduced due primarily to the spread of the use of mobile telephony and the internet; awareness of the need to own a licence in order to operate a CB radio is low, partially due to the reduction of the number of active CB clubs. There is also little risk to illegal operators of being detected and duly processed, so many who are aware of the licencing requirement knowingly flout the law.

Those conscientious operators who endeavour to comply with statutory regulations are effectively being penalised, paying a licence fee and gaining no benefit in return.

CB radio is still an important facility to many people who live in isolated areas, or who are confined to their home through disability, for instance. Increasing the licence fee in order to cover increasing costs would only serve to penalise vulnerable and often low-income members of society even further. Removal of the obligation to hold a licence is a far fairer option to all concerned.

Question 2: Do you agree with Ofcom's proposals to permit the use of 'Micro' FM transmitters in the UK, and to authorise that use by licence exemption.: Although I haven't looked closely at the issues involved, I have no objection to this subject to the selection of frequencies unlikely to interfere with commercial FM stations, and that eavesdropping devices are specifically outlawed or subject to stringent licencing arrangements.

Question 3: Do you agree with Ofcom's proposals to exempt users of High Density Fixed Satellite Services (HDFSS) terminals from the need to possess a Wireless Telegraphy Licence.: My knowledge of this area is insufficient to offer an opinion.

Question 4: Do you agree with Ofcom's proposals to exempt users of Inmarsat GAN terminals from the need to possess a Wireless telegraphy Licence.: My knowledge of this area is insufficient to offer an opinion.

Question 5: Do you agree with Ofcom's proposals to make available the frequency 24.05-24.25 GHz for use by short range radar (including automotive applications) devices on a licence-exempt basis.: I am not knowledgeable about this, but I would first question who are the consumers in this case? If the consumers are industrial, then in my opinion it would be right to operate a licence system. If it is anticipated that the consumer will be the general public, then there may be a case for the frequency/application to be licence exempt.

Question 6: Do you with Ofcom's proposals to make available the band 2.4 GHz-2.4385 GHz for movement detection systems.: My knowledge of this area is insufficient to offer an opinion.

Question 7: Do you with Ofcom's proposals to remove the need for users of most radar level gauge equipment to possess a Wireless Telegraphy Licence.: I am not knowledgeable about this, but if I understand correctly, the equipment under discussion is entirely passive, and will not create any congestion. This being the case, I see no justification for any licencing requirement.

Question 8: Do you agree with Ofcom's proposals to exempt users Digital PMR 446 from the need to possess a Wireless telegraphy Licence.: I was under the impression that this was already the case. If I am mistaken, then yes, I do agree.

Question 9: Ofcom would welcome comments on it proposals to implements these changes concerning short range devices.: It would have been useful to provide some reference material with the questionnaire.

I think that the term "short range" needs clarification - under certain circumstances, CB radio transmitted at only 4 watts is capable of broadcasting over many hundreds of miles. With optimal antenna calibration, design, and siting, transmission distances in excess of 30 miles can be consistently achieved.

These "short ranges" are very different from the 10-15 feet that micro FM devices are intended to operate over.

Question 10: Ofcom would welcome comments on it proposals to implement EC Decision 2005/928/.: I don't have a clue what you are talking about.

Question 11: Ofcom would welcome comments on it proposals to implement EC Decision 2005/513/.: I don't have a clue what you are talking about.

Question 12: Ofcom would welcome comments on any of the minor changes set out in this chapter and any other broader issues in relation to its approach to licence-exemption.: See comments in response to question 9.

Additional comments: See comments in response to question 9.