

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.: Wireless Telegraphy Exemption
Amending the Wireless Telegraphy (Exemption) Regulations 2003

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 agree with the regulators proposal to exempt users of CB Radio from the need to possess a licence.

I also wish to add further comments regarding the proposal.

In Section 3.9 of the consultation document, it states that it is proposed to remove some Technical restrictions namely:

the specific prohibition of Node or repeater operation

and

the need to limit data transmissions to particular channels.

Whilst welcoming this proposal, I believe that other restrictions should also be removed from the Terms, Provisions and Limitations (RA369) REV1 namely:

Prohibition of operation of all mailbox and bulletin board systems

and

Prohibition of the interconnection with the Public Switch Telephone Network (PSTN)

Mailbox and BBS operation are allowed in other EU member states, thereby enhancing the service there, also any restrictions regarding PSTN connection are now largely historical as the PSTN market is now fully liberalised and protectionist measures are no longer needed.

Other Issues with RA369

The description of DATA in Clause 12c of RA369 is too restrictive as it only allows the use of AX25 Packet Protocol and not other modes which are more modern and efficient, a more general 'DATA' description would allow other existing and future modes to be implemented without future intervention of the regulator.

Clause 12e of RA369, The requirement to Identify the station by transmitting the station Postcode by using Morse Telegraphy, is also problematic as it requires the CB operator to Purchase a TNC (Terminal Node Connector) to Comply with the regulations, these units are expensive and many of their features eg Digipeater are prohibited by existing RA369 Terms and conditions, I believe that such restrictions have prevented the widespread use of this facility.

Using a software based (Cheap) AX25 system presently requires an 'after market' Morse Identifying

device, to comply with Clause 12e, such units are very difficult to obtain and would require electronic knowledge to build one, which is beyond the capabilities of an 'operator', I believe such restrictions should be removed.

This, along with a Wireless Telegraphy Exempt CB system would allow Schools, Colleges and other centres of learning to build and operate small wireless based Data Systems for educational purposes without the need for a CB license or Complex Amateur Radio licensing.

In Section 3.12 of the Consultation Document, the regulator makes no reference to the use of equipment complying to ETS 300 433, namely DSB/SSB CB equipment.

Other EU member states allow the legal use of such equipment; eg Comreg in Eire legalised such equipment in November 1998, I cannot see why restrictions on such equipment are still in place in the UK?.

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.:

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.:

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.:

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.:

Question 6: Do you with Ofcom's proposals to make available the band 2.4 GHz-2.4385 GHz for movement detection systems.:

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.:

Question 8: Do you agree with Ofcom's proposals to exempt users Digital PMR 446 from the need to possess a Wireless telegraphy Licence.:

Question 9: Ofcom would welcome comments on it proposals to implements these changes concerning short range devices.:

Question 10: Ofcom would welcome comments on it proposals to implement EC Decision 2005/928/.:

Question 11: Ofcom would welcome comments on it proposals to implement EC Decision 2005/513/.: I welcome OFCOM's decision to remove the restriction on service type, as this rule presently prevents fixed links being installed by Community Wireless Groups on the 5.8Ghz Band thus easing pressure on the 2.4Ghz band.

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.: