

Additional Comment on Schedule Changes (Ofcom Question-1)

Question-1 of the Ofcom amateur licence consultation proposes to copy the existing clauses from the 472kHz and 5MHz NoVs into the main licence

RSGB believe there may be simpler ways of doing this than proposed, but in particular recognise that there are serious concerns being expressed by members in particular regarding proposals 2.26.3 and 2.26.6 relating to the 472kHz band:-

*2.26.3: The station must not cause interference to, and may not claim protection from, other wireless telegraphy **or electronic equipment**.*

RSGB shares concerns regarding the EMC implications of this requirement. The other proposed clauses could in any case be catered for by a standard secondary allocation in the frequency schedule.

*2.26.6: The licensee **must take** suitable precautions, particularly in locations to which people have access, to minimise the risks associated with exposure to Radio Frequency ("RF") radiation. Advice concerning safe levels of exposure to RF radiation is provided by the Health Protection Agency.*

RSGB shares concerns that this represents a compulsory RadHaz condition. Furthermore we believe 2.26.6 may not be necessary as Schedule-1 of the licence conditions already has a similar, but advisory, item as per Note-e below (though that note needs to be updated in any case as the HPA no longer exists)

For information, the current Schedule-1 note (e) is:-

(e) In all frequency bands, high intensities of radio frequency radiation may be harmful and safety precautions should be taken. Advice concerning safe levels of exposure to radio frequency radiation is provided by the Health Protection Agency