#### NTRC GRENADA

# RESPONSE TO THE DRAFT TELECOMMUNICATIONS AMATEUR RADIO REGULATIONS CONSULTATION DOCUMENT

#### INTRODUCTION

The National Telecommunications Regulatory Commission in conjunction with the Amateur Radio Clubs in Grenada is pleased to provide the following comments in response to the Draft Telecommunications Amateur Radio Regulations consultation document.

#### GENERAL COMMENTS

Section 3 (1) "AMATEUR" should be replaced with "RADIO AMATEUR"

"AMATEUR RADIO STATION LICENSE" should be replaced with "AMATEUR RADIO OPERATOR LICENSE" it's the operator that is licensed and not the station.

Section 5(1) which deals with the approval of radio equipment should be eliminated because it defeats the purpose of Amateur Radio keeping in mind that some operators build their own equipment

Or this sub-section should be amended to read:

"An Amateur Radio operator shall use equipment that is type approved and conforms to the standards with regards to spurious emissions, power output, etc. Homemade equipment must be inspected and approved by the commission or its agents".

Section 6(1) (c): There should not be an age limit or at least the age limit should be set lower, there may be persons under the age of 12 years who know how to operate and can pass the examination. We should be fostering the growth of the Amateur fraternity especially since the big decline due to the proliferation of the internet. We should encourage and get more young people involved keeping in mind that radio amateurs instigate lots of technological innovation.

Section 7(a) should be removed and the following sub-sections should be added

#### **Stations in Distress**

- (a) No provision of these rules prevents the use by an amateur station in distress of any means at its disposal to attract attention, make known its condition and location, and obtain assistance.
- (b) No provision of these rules prevents the use by a station, in the exceptional circumstances described in paragraph (a), of any means of radio communications at its disposal to assist a station in distress.
- 8(b). It is necessary to allow cross communication in emergencies situation, lives may be at stakes, there are real situation where this occurred and lives were saved. Section 8(b) should read: "using the station to call, transmit or send messages to any station other than an amateur radio station except in emergencies".
- 13(2). There are some special events that run for more than 7 days so it is proposed to change this to 21 day to avoid too much inconvenience to the operator. Section 13(2) should read: "A temporary license under sub-regulation (1) shall be for a maximum of 21 days duration, subject to renewal by the commission for an additional period not exceeding 7 days"

## Section 18 should read as follows:

## Power to issue guidelines

- (a) For the purpose of giving effect to these regulations, the commission may, at its own discretion and in consultation with ECTEL and the Amateur Radio Community, publish guidelines on any aspect of these regulations.
- (b) The commission in consultation with ECTEL and the Amateur Radio community may at any time amend these guidelines as it sees fit.

## **SCHEDULE**

### Table A – NOVICE CLASS:

The first segment in the 40m band which is stated as 7.100–7.150 should be changed to 7.100–7.130

## Table B – GENERAL CLASS

From the 160m band to the last 6m segment, the power should be 500 PEP (watts)

All segments in the 2m band should be 200 PEP (watts)
All 222MHz and 440MHz segments should be raised to 200 PEP (watts)

60m band should be 5.250–5.450 and power raised to 500 PEP (watts) (This should be PEP and Not ERP); also the modes of operation should include CW.

There is no need to channelize the 60m band, we don't have the same situation in the USA where there are other users in that band and interference is tried to be kept at minimal. Also, some countries, example: Trinidad and Barbados do not channelized this band so this means if this band is channelized local operators will not be able to communicate with Trinidad and Barbados operators who are operating on any of the restricted channels in that band.

## Table C - ADVANCE CLASS

In the head column "TX POWER" should be replaced with "PEP"

From the 160m band down to the last 10m segment, the power should be raised to 1500 PEP (watts) except for the 60m band which should be raised to 1000 PEP (watts) (This should be PEP and Not ERP)

60m band should be 5.250–5.450 and the modes of operation should include CW. There is no need to channelise the 60m band, we don't have the same situation in the USA where there are other users in that band and interference is tried to be kept at minimal. Also, some countries, example: Trinidad and Barbados do not channelized this band so this means if this band is channelized local operators will not be able to communicate with Trinidad and Barbados operators who are operating on any of the restricted channels in that band.

All segments in the 6m band should be raised to 1000 PEP (watts) All segments in the 2m band should be raised to 500 PEP (watts) All the 222MHz and 440MHz should be raised to 500 PEP (watts) All 900MHz and 1240MHz should be raised to 50 PEP (watts)