



National Telecommunications Regulatory Commission
St. Vincent and the Grenadines

Ref. No. COR/ECTEL

September 17, 2010

Mr. Embert Charles
Managing Director
ECTEL
Vide Boutielle
P. O. Box 1886
St. Lucia

Dear Mr. Charles,

Draft Amateur Regulations

The Commission, having reviewed the Draft Amateur Regulations, wishes to comment as follows:

1. That the minimum age for obtaining an Amateur radio licence as outlined in regulation 6 (1) (c) should be 10 years instead of 12 years of age. This would allow an earlier involvement of students at the secondary level to participate in Amateur activities.
2. In the "Interpretation" section, 'Amateur service' (see page 7), is better reworded as follows" in radio technique and technologies solely with an aim for personal development and on a non-pecuniary basis'; and anywhere else a similar phrase appears.
3. The Section "General obligations of amateur radio stations licensees", sub section (b) (see page 9) requires a sentence stating: 'See appendix for list of countries with which SVG has reciprocal agreements '. There should be two lists in the appendix, one for

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[Member countries] and another for countries with which we have reciprocal agreements.

Suggested addition to the section "General obligations of amateur radio stations licensees", sub section (b) is ok.

4. The section "Exemptions" sub section (1b) (see page 11) should read "..... a valid amateur radio license issued by a non-Ectel member state with which a member state has signed a reciprocal agreement to allow operation of an amateur radio station in the non-Ectel member state without the need to obtain a license." 'However such persons must notify the local regulatory commission of their intention to operate in the state, the location(s) of the transmitter and the duration of the operation while in the state.'

Subsection 3 of the same exemptions section indicate that any such person has to register with the Commission and as such this process enables the Commission to know of their intention to operate. The location of the transmitter and duration of operation can be build into the registration process.

5. In table B (see page 13), frequency privileges for General class licenses has been limited to 440 MHz as the highest operating band. In other countries and previous to this draft, General class licensees have enjoyed the same frequency privileges as Advance class, the only difference being the output power. The consensus from discussions with radio amateurs is that General class amateurs should be given similar frequency privileges as Advance class licensees. In the US and Canada for example, Novice class radio operators have frequency privileges from 2M upwards on all amateur radio allocations. This allows for continuing experimentation among all classes of amateurs, the only difference being the power output.

We agree that General class amateurs should be given similar frequency privileges as Advance class licensees. The novice class licences being issued by our NTRC as well as the ECTEL regional spectrum plan includes assignments up to 2450 MHz thus the general and advanced classes should also have at least the same privileges.

6. The Commission would appreciate if ECTEL can also look into reallocating some of the existing Morse code bands.

Also attach are the comments submitted by the Rainbow Radio League (RRB). The RRB is the largest and most active amateur radio organization in our country. As you would note most of our comments above are extracted from what was submitted by the RRB and which we fully support.

Sincerely yours,



Apollo Knights
Secretary/Director
NTRC

E-11160

The Director ,
NTRC.

Mr. Knights,

The draft Telecommunications Regulations governing amateur radio seems to be a good document in the making. Thanks for the opportunity to make an input as you continue to fine tune this set of regulations. There are just a few minor adjustments and omissions which I will bring to your attention later in this response.

In the section "Interpretation" in the sub section 'Amateur service' , this should read " in radio technique and technologies solely with an aim for personal development and on a non-pecuniary basis' ; and anywhere else a similar phrase appears.

In the section "General obligations of amateur radio stations licensees", sub section (b) requires a sentence stating: 'See appendix for list of countries with which SVG has reciprocal agreements '. There should be two lists in the appendix, one for [Member countries] and another for countries with which we have reciprocal agreements.

Sub section (c) should read: " The station is in all cases operated by the licensee or by any person not holding a valid license in the presence and under the supervision of the licensee or control operator. The licensee or 'control operator' under these circumstances must be the holder of at least a general class license and must observe the once every 10 minutes protocol for identifying such a station's call sign.

This clause is especially useful for events like Jamboree on the Air (JOTA) during which girl guides and boy scouts from all over the world meet for a two -day jamboree where contacts are made with scouts and girls guides from different

countries via amateur radio, or for making contact with cadets when they are staging their annual regional camps.

In the section "Exemptions" (1) sub section (b) should read " a valid amateur radio license issued by a non-Ectel member state with which a member state has signed a reciprocal agreement to allow operation of an amateur radio station in the non-Ectel member state without the need to obtain a license." 'However such persons must notify the local regulatory commission of their intention to operate in the state, the location(s) of the transmitter and the duration of the operation while in the state.'

In Table A there are a few omissions 15M 21.000 Mhz - 21.450 Mhz. and 432.000 Mhz. - 450.000 Mhz. We also want to include 60M in the Novice allocation, as this band is critically important for emergency communications. As all are aware, 'all hands need to be on deck' during a disaster.

In table B, frequency privileges for General class licenses has been limited to 440 Mhz as the highest operating band. In other countries and previous to this draft, General class licensees have enjoyed the same frequency privileges as Advance class, the only difference being the output power. The consensus from discussions with other radio amateurs is that General class amateurs should be given similar frequency privileges as Advance class licensees. In the US and Canada for example, Novice class radio operators have frequency privileges from 2M upwards on all amateur radio allocations. This allows for continuing experimentation among all classes of amateurs, the only difference being the power output.

Finally but most importantly is the welcome news that 60M or the 5 Mhz band is finally available for use by radio amateurs in this region. Since this news was made public there has been considerable discussion on the airwaves among regional radio amateurs, the most recent being this morning (July 25, 2010). 5 Mhz is the most reliable band during daytime communications for short to medium distance communications. However, the 'channelized' suggestion will limit participation in an

already crowded band. The suggestion, looking at the global allocation for radio amateurs including the regional band plans for Trinidad and Barbados, is for a slot on the 60 M band beginning at 5.250 Mhz. to 5.450 Mhz. for all classes of licenses. This band is especially useful for emergency communications. We have no problems with the output power suggested for 60M.

As stated at the beginning, the document is a good one in the making, with these little 'tweaks', the final document should be a model for other countries who have not yet done so.