

Catriona Lawrence  
Internal Reviewer

FOI Ref: 01296704  
Internal Review ref: 01296704

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2 August 2021

Dear Mr Hope,

## Internal Review: Call Sign Policy

Thank you for your email dated 17 July 2021, where you asked for an internal review of Ofcom's response to your Freedom of Information Act ('the FOI Act') request (ref: 01296704) dated 30 June 2021.

### Background

#### *Your FOI request*

In your original request, dated 2 June 2021, you wrote the following:

*Please list the Date when Ofcom changed published policy on re-issuing Amateur radio call signs.*

*Previously the RA, then Ofcom would only permit a previously issued call sign to be given to another amateur or a club, with written permission from the previous holder or the Previous holders Family. This was Policy for a number of years*

*Now anyone can apply for a call sign that was previously held or issued, which means we have recent licencees, Holding G3 call signs*

*When did Policy change, who agreed and why were us Amateurs not consulted on the Change, it is a insult to Silent Keys and almost like Graverobbing that you hear Old call signs on the Air and I urge Ofcom to reconsider Policy*

Ofcom's Information Request Team ('the IR Team') responded to your request on 30 June 2021. In the letter it advised that it was unaware of Ofcom having ever applied a policy whereby a radio station call sign may be assigned only with the consent of another party. It provided a link to Ofcom's [online guidance for licensees](https://www.ofcom.org.uk/data/assets/pdf_file/0026/82637/amateur_radio_licence_guidance_for_licensees.pdf)<sup>1</sup>, noting that paragraphs 1.16 to 1.18 describe the approach taken in reusing old call signs.

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<sup>1</sup>

[https://www.ofcom.org.uk/data/assets/pdf\\_file/0026/82637/amateur\\_radio\\_licence\\_guidance\\_for\\_licensees.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0026/82637/amateur_radio_licence_guidance_for_licensees.pdf)

### *Your further request for clarification*

On 30 June you responded to the IR Team from your personal email address, rather than your 'whatdotheyknow.com' email address. You suggested that they "look through the Old GPO and RA records, before saying Ofcom has never had a Policy of asking for Permission to reuse call signs". You also advised that the process of requesting written permission from the previous holder, or their family should they be deceased, had existed and been taught in Amateur Radio exams.

You received a further response from the Team on 14 July which was sent to your personal email address. In this response it again advised that Ofcom held no record of such a policy. It did, however, note that:

*in 2006 a document was published indicating that, in some circumstances, Ofcom might seek others' agreement before allowing a call sign to be transferred from one licensee to another but this was for the transfer of call signs, not their assignment. That document was withdrawn some five years ago.*

### **Internal review**

#### *Your request*

Following this response of 14 July, you sent five further emails to the IR Team from your 'whatdotheyknow.com' email address. In the first of these emails, sent on 17 July, you submitted the following request:

*Would Like a Review as you have not replied to my request for you to go through the archives and actually refresh your memory, As many amateurs have said it was policy and formed part of the licence documents under the RA/GPO.*

*Go back read history, and realise what a huge mistake you have made.*

In the second email, also of 17 July, you again suggested that the IR Team look in Ofcom's own archives where you claimed to have found a statement on the topic, published on 31 May 2006. This statement, which you included in the body of the email, included the following two points:

- *Ofcom will transfer a call sign from one radio amateur to another radio amateur providing that the call sign holder consents to the transfer. Ofcom will require a letter of instruction from the call sign holder as evidence of consent.*
- *Ofcom will also transfer a call sign from a deceased radio amateur to another radio amateur. Ofcom will require a letter of instruction from the call sign holder's executor (or administrator) as evidence of consent.*

In the third, sent on 26 July, you provided a link to Ofcom's [transfer of amateur radio call signs policy](https://web.archive.org/web/20120713191813/https://licensing.ofcom.org.uk/binaries/spectrum/amateur-radio/guidance-for-licensees/amateur-radio-call-signs/transfercall%20signs.pdf)<sup>2</sup>, published in 2006, which had been archived on the WayBack Machine, an internet archive

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<sup>2</sup> [https://web.archive.org/web/20120713191813/https://licensing.ofcom.org.uk/binaries/spectrum/amateur-radio/guidance-for-licensees/amateur-radio-call-signs/transfercall signs.pdf](https://web.archive.org/web/20120713191813/https://licensing.ofcom.org.uk/binaries/spectrum/amateur-radio/guidance-for-licensees/amateur-radio-call-signs/transfercall%20signs.pdf)

service. You then requested for your request to be answered, alongside a formal apology, by Friday 30 July as you considered that the IR Team had “had enough time to deal with this”.

Your final two emails of 29 and 30 July concerned your wish to receive a response to your request by 30 July and 6 August respectively.

### *My assessment*

I can confirm that Ofcom does not hold the information you have requested. As advised by the IR Team, this is because Ofcom has never applied a policy whereby a radio station call sign may be assigned only with the consent of another party. In addition, we are unaware of any such policy being applied by Ofcom’s immediate predecessor.

Having searched Ofcom’s website, I cannot find the information you provided in your second email of 17 July. However, it does appear on an [amateur radio website](#)<sup>3</sup>, which provides a link to an Ofcom document that is no longer available on the Ofcom website. The relevant Ofcom colleagues have advised that the missing policy is the same policy referred to in the IR Team’s email of 14 July, which was published in 2006 and removed from the Ofcom website five years ago upon its retirement. This is also the same policy (the transfer of amateur radio call signs policy) that you provided a link to in your email of 26 July, which has been archived on the WayBack Machine.

As advised by the IR Team on 14 July, this policy indicated that “in some circumstances, Ofcom might seek others’ agreement before allowing a call sign to be transferred from one licensee to another but this was for the *transfer* of call signs, not their *assignment*”. I believe it would be helpful to explain the difference between transfer and assignment in this context.

First, Ofcom’s approach to the assignment of call signs can be found in paragraphs 1.16 to 1.18 of our [online guidance](#)<sup>4</sup>. Following this approach, if an amateur radio licence is surrendered (including cases where the previous holder has died), the call sign is retired and remains unavailable for two years. Thereafter, a subsequent applicant for a licence may expressly request the call sign. If an applicant does not request a particular call sign, they will be assigned the first available call sign in the sequence for that class of licence.

Second, before its retirement, the transfer of amateur radio call signs policy allowed for a call sign to be transferred between licensees without needing to be retired for two years, as set out above. This was only allowed in exceptional circumstances and required a letter of instruction from the call sign holder or, if deceased, their executor, as evidence of consent.

I appreciate you feel strongly about the recycling of call signs. However, call signs are a finite resource and Ofcom must adopt policies that optimise the availability of this resource. I hope that my above explanation assures you that, while Ofcom no longer allows call signs to be transferred,

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<sup>3</sup> <http://www.amateurradio.eu/gm/licencing/transferring-call-signs.htm>

<sup>4</sup>

[https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0026/82637/amateur\\_radio\\_licence\\_guidance\\_for\\_licensees.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0026/82637/amateur_radio_licence_guidance_for_licensees.pdf)

even with written consent, we do not reassign a call sign to a new licensee until a reasonable period of time has elapsed.

### Further considerations

If you have any queries, then please contact [information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk). Please remember to quote the reference number above in any future communications.

Yours sincerely,

Catriona Lawrence

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Your complaint should be raised within three months of your internal review.