

22 June 2015

Mr Chris Lewis
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Director Sector Policy

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Dear Chris

As you know, the Radio Society of Great Britain ("RSGB") challenged our decision to permit licensed Radio Amateurs with a main station address in Cornwall to use the Regional Secondary Locator ("RSL") 'K'. In considering your request, we adopted the only approach available and applied the process that we follow for requests for *temporary* RSLs. In light of the RSGB's challenge, however, we have reviewed this decision and the associated policy, which is why it has taken so long to respond.

The RSGB pointed out that, in our initial reply to you, we said that permanent RSLs were limited to those needed to represent the nations of the UK and the Crown Dependencies and that to subdivide the nations further, would set a precedent and could lead to a proliferation of RSLs and to confusion over the identity of UK Amateur Radio stations. The RSGB also complained that we had no policy for allocating permanent RSLs and that the criteria and process that we had followed in this case (essentially relying on the Framework Convention) had not been the subject of consultation.

We have therefore conducted a thorough review of established custom and practice; we have looked at past cases and we have examined the rationale for the policy. We have concluded that our established policy does not permit the allocation of new permanent RSLs, and no allocation process or policy is in place to manage such requests. We have therefore concluded that we have no basis on which to make *any* new permanent RSLs available to *any* applicant. We are consequently no longer able to make 'K' available as a permanent RSL to identify Cornish Amateur Radio stations and we must withdraw the offer contained in our message of 11th September 2014.

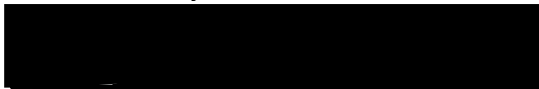
We have also considered whether it would be appropriate to explore further the possibility of changing our policy with a view to permitting new permanent RSLs. Our assessment is that to develop and implement such a new framework would present significant challenges and be time consuming and very costly. We also believe that authorising additional permanent RSLs does not contribute to the fulfilment of any of our statutory duties or functions. Consequently, in view of the cost of developing and implementing changes to put in place a wider framework for allocating new permanent RSLs and the absence of any spectrum management value in such a measure, we believe that it is not proportionate or justified to pursue the development or implementation of changes for allocating new permanent RSLs.

We are happy make 'K' available as a temporary RSL to licensees with a Main Station Address in Cornwall. This would be available by individual licence variation. In line with other temporary RSLs that we have made available, all variations that we might issue for this purpose would be valid for up to one year and would expire on the same date. Having been assigned to Cornish Radio Amateurs, 'K' would not be made available again until we were satisfied that its reuse would not cause confusion.

While I understand that this outcome must be disappointing, I hope that the temporary use of the RSL will be some recompense.

I attach a copy of our policy on Temporary Call Signs and Call Sign Enhancements, which we shall publish on our website.

Yours sincerely

A solid black rectangular box used to redact the signature of Russell Kent-Smith.

Russell Kent-Smith