



Revision of the Amateur Radio Licensing framework Consultation Document

Internal Reference:
MCA/C/17-3047

Publication Date:
19 December 2017

Closing Date for Submission of Responses:
2 February 2018

Contents

1. Purpose of document	1
2. Introduction	2
2.1 Definition of the amateur radio service.....	2
3. National amateur radio licensing framework	3
3.1 Permanent licences	3
3.2 Temporary licences.....	4
3.3 Call sign prefixes for the amateur radio service	4
4. International deliverables governing the radio amateur service	5
4.1 International Telecommunication Union (ITU)	5
4.2 European Union (EU)	5
4.3 European Conference of Postal and Telecommunications Administrations (CEPT)	6
5. Proposed revisions	7
5.1 Permanent licensing regime.....	7
5.1.1 Licence type	7
5.1.2 Term of permanent licences.....	7
5.1.3 Licence validation mechanism	8
5.1.4 Licence fees.....	8
5.2 Temporary licensing regime.....	9
5.2.1 Visitors’ licensing arrangement.....	9
5.2.2 Special events licensing arrangement	10
5.2.3 Licence fees.....	10
5.3 Proposals applicable to the permanent and temporary licensing frameworks	11
5.3.1 Conditions of licences.....	11
5.3.2 Apparatus details in the licence	11
5.3.3 Technical aspects of the amateur radio service.....	12
5.4 Management of radio call signs	14
5.5 Other proposals to the licensing framework	15
5.5.1 Amateur radio examination.....	15
5.5.2 Harmonised Amateur Radio Examination Certificate (HAREC)	16
6. Consultation Framework	18

1. Purpose of document

The general principles founding the current amateur radio licensing framework were established in the 1990's. The Malta Communications Authority (MCA) deems that this framework needs to be reviewed to, amongst other things, regulate this service better and implement 'best practice' licensing principles.

This consultation is therefore proposing a number of changes to the amateur radio licensing framework and the MCA would like to receive feedback from stakeholders on these proposals. Interested parties are hereby invited to submit their views to the MCA and are requested to provide all relevant data in support of their submissions.

2. Introduction

One of the regulatory functions carried out by the MCA is to issue licences authorising the right to use radio spectrum and radiocommunications apparatus. This function stems from the Electronic Communications (Regulation) Act (Chapter 399 of the Laws of Malta)¹ and, amongst other things, requires the MCA to secure the optimal use of radio frequencies, a scarce and valuable resource. This obligation is in part fulfilled through the establishment of appropriate licensing frameworks and conditions in licences that the MCA issues under the ECRA. These frameworks and associated conditions must be objective, transparent, non-discriminatory and proportionate.

With respect to the amateur radio service, the MCA issues individual licences following receipt of duly completed applications from qualified applicants. The MCA establishes the most appropriate terms, conditions and limitations as it deems fit, including limitations as to the apparatus which may be installed or used and the places where it may be used.

2.1 Definition of the amateur radio service

The National Frequency Plan² defines the amateur radio service as “a radiocommunication service for the purpose of self-training, intercommunication and technical investigations carried out by amateurs, that is, by duly authorised persons interested in radio technique solely with a personal aim and without pecuniary interest”.

This service therefore allows authorised persons to use radio frequency spectrum for purposes of non-commercial exchange of messages, wireless experimentation, self-training, private recreation, contesting, and emergency communication.

It should be noted that stations within the amateur radio service operate on the frequency bands allocated to the Amateur and Amateur-Satellite services in the National Frequency Plan. In addition, no radio frequency is assigned to a radio amateur user for radio amateur purposes.

¹ For the purpose of this document the Electronic Communications (Regulation) Act is hereby referred to as 'ECRA'.

² http://mca.org.mt/regulatory/authorizations_licensing/national_frequency_plan.

3. National amateur radio licensing framework

Amateur radio licences are granted by the MCA in accordance with Part IV of the ECRA and give the right to holders to establish and operate an amateur radio station. The associated licence fees are established under the Fees Leviable by Government Departments Regulations (S.L.35.01 of the Laws of Malta)³.

The current licensing framework for this service establishes two main licence types as described below.

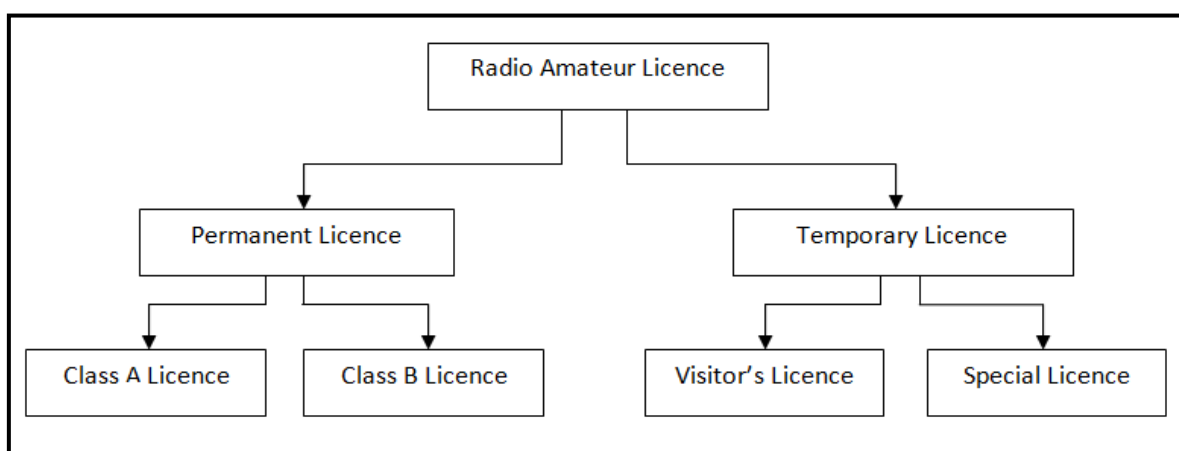


Figure 1 Different amateur radio licence types

3.1 Permanent licences

This licence type is applicable to licensees residing in Malta.

As can be noted from Figure 1 above, permanent licences are divided in two classes to distinguish between the qualification a licensee holds. A Class A licence represents licensees holding a Morse qualification, whilst the Class B licence represents those licensees not holding such a qualification. Class A licenses are assigned with a 9H1 or 9H4 call sign prefix, while the call sign prefix for Class B licensees is 9H5. As at end September 2017 the total number of licensed Class A and B radio amateurs stood at 438.

³ <http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=9065&l=1>.

Permanent licences are generally valid for a one-year term and are renewed annually unless previously cancelled or revoked⁴. The grant of permanent licences is subject to the payment of €13.90 annually.

3.2 Temporary licences

Temporary amateur radio licences are issued to applicants who need to establish an amateur radio station in Malta for a limited period of time.

Visitor’s licences are issued to foreign amateur radio users that intend to use their amateur radio equipment while in Malta. A call sign having a 9H3 prefix is assigned to licensees under this licensing regime. A license fee of €11.60 is only levied to applicants not holding a recognised amateur radio qualification. At end September 2017 the MCA issued 65 visitors licences all of which at no charge.

Special licences are granted to applicants requesting assignment of a call sign to commemorate special events or for radio contests. These licences assign a call sign having a 9H9 call sign prefix against a payment of €11.60.

3.3 Call sign prefixes for the amateur radio service

The MCA assigns a call sign through the grant of individual amateur radio licences. The below table provides general information on the designations of the various call sign prefixes that are used today.

Prefix	Applicability
9H1	Permanent Maltese licensees having a Morse qualification
9H3	Visiting licensees
9H4	Permanent licensees having a Morse qualification, having their registered address in Gozo
9H5	Permanent licensees not having a Morse qualification
9H9	Temporary licences for special occasions

⁴ A radio amateur licensee may opt to pay the licensing fee 4 years in advanced.

4. International deliverables governing the radio amateur service

4.1 International Telecommunication Union (ITU)

The ITU is a specialised agency of the United Nations for information and communication technologies (ICT). It develops technical standards that ensure networks and technologies seamlessly interconnect, and strive to improve access to ICTs to underserved communities worldwide. Through its Radiocommunication Sector, amongst other things, the ITU ensures the rational, equitable, efficient and economical use of the radio-frequency spectrum by all radiocommunication services, including those using satellite orbits.

The legal framework of the ITU comprises a number of regulatory instruments, including the Radio Regulations (RR)⁵. The RR promotes the rational and efficient use of radio spectrum and require radiocommunication transmissions to not cause harmful interference to other radiocommunication services. In addition, the RR also require transmissions to be licensed by the Member States.

The RR Articles 5, 19 and 25 are of direct relevance to the amateur radio service. Article 5 includes the table of frequency allocations and allocates a number of frequency bands to this service either on a primary or secondary basis. Article 19 deals with the identification of transmitting stations. This article requires that all transmissions are capable of being identified by either identification signals or by other means. In this regard radio amateur stations are identified by means of a radio call sign having the form established in Appendix 42 of the RR. Article 25 defines certain operating parameters relating to the provision of the amateur and amateur-satellite service.

4.2 European Union (EU)

From a radiocommunications point of view, the EU legislation concerning the amateur radio service relates to the making available and putting into service of radio equipment, i.e. the Radio Equipment Directive (RED) 2014/53/EU⁶. In particular, this Directive requires that radio equipment is constructed so as to:

- ensure the protection of health and safety of persons and of domestic animals and the protection of property;

⁵ <http://www.itu.int/pub/R-REG-RR/en>.

⁶ <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32014L0053>.

- ensure an adequate level of electromagnetic compatibility; and
- effectively uses and supports the efficient use of radio spectrum in order to avoid harmful interference.

Radio equipment used by radio amateurs, which equipment is made available on the market falls within the scope of the RED. However, certain radio equipment that is not made available on the market is not regulated by the RED. This equipment includes:

- radio kits for assembly and use by radio amateurs;
- radio equipment modified by and for the use of radio amateurs; and
- equipment constructed by individual radio amateurs for experimental and scientific purposes related to amateur radio.

4.3 European Conference of Postal and Telecommunications Administrations (CEPT)

The CEPT is an organisation where policy makers and regulatory from 48 countries across Europe collaborate to harmonise telecommunication, radio spectrum and postal regulations to improve efficiency and coordination for the benefit of European society. Over the years the CEPT's Electronic Communications Committee (ECC) has adopted a number of deliverables⁷ concerning the amateur radio service, the main ones being:

- Recommendation T/R 61-01 concerning the CEPT Radio Amateur Licence; and
- Recommendation T/R 61-02 concerning the Harmonised Amateur Radio Examination Certificate (HAREC).

Through Recommendation T/R 61-01 radio amateurs from countries signatories to this Recommendation can operate during short visits in other countries signatories to this Recommendation without obtaining an individual temporary licence from the visited country. Recommendation T/R 61-02 makes it possible for CEPT administrations to issue a Harmonised Amateur Radio Examination Certificate (HAREC). This certificate shows that a person has successfully passed an amateur radio examination in compliance with the examination syllabus established in Recommendation T/R 61-02.

⁷ <http://www.erodocdb.dk/doks/doccategoryECC.aspx?doccatid=2>.

5. Proposed revisions

The information contained under this section puts forward for consultation a number of proposals to rationalise the amateur radio licensing framework. In establishing these proposals the Government and the MCA aim to:

- a) regulate better the amateur radio service thereby reducing any unnecessary administrative burden and bureaucracy on current and future licensees as well as on the MCA;
- b) increase the transparency in regulating the amateur radio service; and
- c) implement the harmonized licensing practices of CEPT.

5.1 Permanent licensing regime

5.1.1 Licence type

As stated earlier in this document, the current framework is based on an individual licensing regime. This means that each licensee is licensed individually.

The MCA considers that this licensing regime is appropriate since through this regime, the MCA is assigning the right to use a call sign and has a record where the amateur radio stations are established.

In this regard the MCA is proposing to retain this type of licensing regime.

5.1.2 Term of permanent licences

Permanent amateur-radio licences that are issued today are valid for a one-year term, unless previously cancelled or revoked. The MCA also offers the possibility for permanent licensees to settle four annual terms in advance as a measure to facilitate the licence renewal process.

The MCA, taking into account the above-mentioned objectives, i.e. to reduce the administrative burden and bureaucracy, and to regulate this service more effectively, is proposing to introduce an optional life-time licensing regime. This new licensing category will therefore provide an alternative option to the current yearly licensing regime.

In this regard during the licence renewal process the MCA will be inviting licensees to indicate their preferred type of licence category that would be deemed to be the most appropriate for them.

5.1.3 Licence validation mechanism

Due to the introduction of the life-time licensing regime the MCA is proposing to implement a periodic licence validation mechanism. This mechanism will contribute in keeping MCA's licensing records up to date and prevents them from becoming unreliable. In particular, through this process the MCA will ensure that the permanent amateur radio licence granted to licensees is still required and that the licensees contact information as well as the location of the amateur radio station are correct.

The MCA is proposing that this licence validation process is carried out periodically, using electronic means, such as online forms. Should a licensee fails to validate the licence, the MCA will first seek to contact that individual, reminding him or her of the relevant obligations and to give a reasonable time period by when the licensee can complete the validation process. In circumstances where revocation might subsequently be considered, the MCA will serve a notice on the relevant licensee, setting out MCA's reasons for proposing the revocation and to allow that individual an opportunity to make its final representations. It is only after MCA has duly considered those representations that it might then decide to revoke the licence.

The MCA will therefore have the right to terminate the licence if as a result of this process, a licensee fails to validate the licence or if the licensee confirms that the licence is no longer required. In this regard the MCA will be publishing the details of the call signs which will be revoked through this licence validation mechanism or any other licence procedures which could be initiated by the MCA.

5.1.4 Licence fees

The fees for the grant of amateur radio licences are established by Government and are published in the Fees Leviable by Government Departments Regulations (SL35.01).

The Government, following consultation with the MCA is proposing to round-downwards the current fee of €13.90 to €13.00 with respect to licences having a one-year term.

For the new life-time licence category the Government considers appropriate introducing a €45 one-time fee. Those class A and class B licensees that will opt for a life-time licence category during the licence renewal process will be requested to pay this one-time fee.

In addition, under the new life-time licence category Government is also proposing to reduce the licence fee to €20 for those class A and class B licensees which either at the licence renewal due date or when they have submitted an application for the grant of a new licence have more than 65 years of age.

- Q1. Do you agree with the proposal to retain an individual licensing regime to regulate the amateur radio service? Please justify in case of disagreement.
- Q2. Do you agree with the introduction of an optional life-time licensing? Please justify.
- Q3. Section 5.1.3 is describing the licence validation mechanism which the MCA is proposing to introduce. Do you have any comments on this proposal?

5.2 Temporary licensing regime

5.2.1 Visitors' licensing arrangement

The MCA is proposing to fully implementing the CEPT Recommendations T/R 61-01 and T/R 61-02. As stated earlier, these Recommendations, amongst other things, establish a common arrangement for radio amateurs who wish to use amateur stations in third countries signatory to these Recommendations. Hence, these deliverables allow radio amateurs from CEPT and some other non-CEPT countries to operate during short visits in other countries without obtaining an individual temporary licence from the visited country.

In this regard the MCA is proposing that visiting radio amateurs enjoying a valid licence issued in compliance with the aforesaid CEPT deliverables will be exempted from the requirement to apply and consequently be granted an individual temporary licence on condition that for the purpose of amateur radio communications, their stay in Malta will not exceed 3 months. In operating their station, visiting amateur radio licensees will nonetheless be required to comply with the applicable national regulations.

Visiting amateur radio licensees staying in Malta for a longer period would need to apply and be granted with an individual temporary licence and pay the associated fees if they would like to use their amateur radio station during their stay in Malta. The MCA is proposing that the term of such individual temporary licences shall not exceed 12 months.

It should be noted that in accordance with CEPT Recommendation T/R 61-01, visiting amateurs will no longer be assigned with a '9H3' call sign. Visiting amateurs operating their station in Malta will be required to use his/her national call sign preceded by the 9H call sign prefix. The call sign prefix and the national call sign must be separated by the character "/" (telegraphy) or the word "stroke" (telephony).

5.2.2 Special events licensing arrangement

Certain amateur radio licensees operate amateur stations to mark special events or occasions. In accordance with the current framework these licensees may, on request, be issued with a licence granting them the right to use a special call sign for a temporary period. The MCA is proposing that the term of such individual temporary licences shall not exceed 12 months.

The MCA considers appropriate to retain the individual licensing regime with respect to the granting of special amateur radio licences since through the issuance of the licence it is also assigning the right to use a call sign.

5.2.3 Licence fees

The current arrangement which is exempting visitors' amateur licensees having a recognised qualification from the requirement of paying any radiocommunications licence fees is to be retained.

The fee for the grant of a licence in respect of:

- visiting amateurs not having a recognised qualification;
- visiting amateurs who will use their amateur station in Malta for a period exceeding 3 months but not exceeding 12 months; and
- special events for a period not exceeding 12 months,

is being revised from €11.60 to €11.

- Q4. Do you agree with the proposal licensing regime applicable to visiting amateurs? Please justify in case of disagreement.
- Q5. Are you in agreement with the proposed regime for special events licences? Please justify.

5.3 Proposals applicable to the permanent and temporary licensing frameworks

5.3.1 Conditions of licences

In accordance with current practice, amateur radio licences encompass a number of conditions which form an integral part of the same licence.

As a measure to increase transparency as well as to ensure a streamlined licensing framework, the MCA is proposing to include the licence conditions in a subsidiary legislation under ECRA. MCA's proposed regulation (draft) is attached.

It should be noted that in accordance with Article 30(4) of ECRA the MCA reserves the right to include any additional terms, conditions and limitations as it deems appropriate in the individual licence, including limitations as to the apparatus which may be installed or used under the said licence and the places where the apparatus may be used.

- Q6. Do you have any reservations on MCA's proposition to include the licence conditions in a subsidiary legislation under ECRA? If yes please provide such justifications.
- Q7. Do you have any comments to the draft regulation attached to this consultation document?

5.3.2 Apparatus details in the licence

The amateur licences which are currently being issued include the details of the radiocommunications apparatus which is intended to be installed or used by the licensee. Such details include the manufacture (make), model as well as the serial number.

The MCA considers that the apparatus information is giving little added value in regulating this service since almost all of the licensed apparatus is in compliance with the applicable EU conformity assessment regulations.

In this regard, in view of the above consideration and of the fact that this service does not require an assignment of radio spectrum since it can operate on designated frequency ranges, the MCA is hereby proposing the removal of the description of the radiocommunications apparatus from the licence. This approach will give full flexibility to licensed amateur radios to transfer their radiocommunications apparatus amongst themselves, thereby eliminating all the administrative burden associated with the transfer process.

It should be noted that the MCA may, at its sole discretion, carry out inspections and/or request information from licensees to verify the compliance of their amateur radio apparatus with the relevant regulations.

In addition the MCA reserves the right to test amateur radio apparatus which is not regulated by the RED (please refer to section 4.2) to ensure that it uses the spectrum efficiently.

Q8. Do you any reservation with respect to MCA's proposal to remove the details of the radiocommunications apparatus from the licence? Please justify in case of disagreement.

5.3.3 Technical aspects of the amateur radio service

Amateur radio licensees can use various modes of transmission to communicate. Two common modes for voice transmissions are frequency modulation (FM) and single sideband (SSB). FM offers high quality audio signals, while SSB is better at long distance communication when bandwidth is restricted.

Amateur radio licensees are allowed to operate on the radio spectrum allocated to the Amateur and Amateur-Satellite service on a primary or secondary basis in the National Frequency Plan. Licensees are required to operate their amateur radio station within these frequency bands and to observe the power limits and any other technical condition as described in the licence.

As indicated under section 5.3.1 above, the MCA will be including radio spectrum related conditions in subsidiary legislation. Such conditions will include the frequency bands which licensees are authorised to use, and the associated transmission power levels. However, the MCA is proposing not to include the mode of transmission which licensees can use for the various frequency bands allocated to this service. Instead, as a measure to increase flexibility, the MCA will require licensees to use the preferred mode of transmission approved and published by the International Amateur Radio Union (IARU) for Region 1 in its official website⁸.

With respect to the radio spectrum allocated to the amateur radio service the MCA intends to recommend to Government some variances to the 2300 – 2400 MHz (2.3 GHz) band. This frequency allocation has a secondary status and amateur radio stations operating in this band:

- shall not cause harmful interference to stations of primary services to which frequencies are already assigned or to which frequencies may be assigned at a later date;
- cannot claim protection from harmful interference from stations of a primary service to which frequencies are already assigned or may be assigned at a later date; and
- cannot claim protection, however, from harmful interference from stations of the same or other secondary service(s) to which frequencies may be assigned at a later date.

Taking the above into account and in consideration of the fact that:

- the RR allocates the 2.3 GHz band to the fixed and mobile service on a primary basis;
- the frequency allocations to fixed and mobile services are on a global basis;
- the RR identifies the band for the terrestrial component of International Mobile Telecommunications (IMT);
- a number of countries, including European, have made available or are in the process of making available the 2.3 GHz band for IMT use;
- the Radio Spectrum Policy Group (RSPG) has adopted an Opinion 13-521⁹ whereby it considered the 2.3 GHz band as a candidate band for the provision of wireless broadband (WBB) services;

⁸ <https://www.iaru-r1.org/index.php/spectrum-and-band-plans>.

⁹ https://circabc.europa.eu/d/a/workspace/SpacesStore/c7597ba6-f00b-44e8-b54d-f6f5d069b097/RSPG13-521_RSPG%20Opinion_on_WBB.pdf.

- the European Commission had mandated the CEPT to developing technical conditions for the introduction of WBB in the 2.3 GHz band;
- the CEPT has adopted a number of reports¹⁰ for the European Commission in response to the above-mentioned mandate on “Harmonised technical conditions for the 2300 - 2400 MHz (‘2.3 GHz’) frequency band in the EU for the provision of wireless broadband electronic communications services”;

the MCA intends to recommend to Government the cancellation of the secondary frequency allocation in the 2.3 GHz band to the amateur radio service.

Q9. Do you any comments with respect to the proposal to include the technical conditions of licences in subsidiary legislation?

Q10. Do you have any comments with respect to the proposed changes to the frequency allocation in the 2.3 GHz band? Please justify in case of disagreement.

5.4 Management of radio call signs

As stated earlier in this document, the ITU RRs require that amateur radio transmissions be identified with a radio call sign. In this regard the MCA assigns a call sign through the grant of individual amateur radio licences based on the call sign assignment plan described in section 3.3 hereof.

The MCA is proposing to make available an additional 3 call sign prefixes to the amateur radio community, that is, to make prefixes 9H6, 9H7 and 9H8 available for the following licences.

Prefix	Licence type
9H6	Temporary licences for radio contests or experimental stations
9H7	Permanent Gozitan licensees not having a Morse qualification
9H8	Temporary licences for special events from Comino

¹⁰ <http://www.erodocdb.dk/doks/doccategory.aspx?doccatid=16>.

With respect to call sign prefix 9H7 the MCA would like to note that although this prefix will be made available to Class B licensees having their registered address in Gozo, existing licensees would be allowed to retain their existing 9H5 call sign if they so wish. However, new licensees will be assigned with a call sign having a 9H7 prefix.

The MCA will therefore be managing call signs based on the amateur radio call sign allocation table described below.

Prefix	Type of Licence	Applicability
9H1	Permanent	Maltese licensees having a Morse qualification
9H3	Temporary	Visiting licensees holders of non-CEPT equivalent qualifications
9H4	Permanent	Gozitan licensees having a Morse qualification
9H5	Permanent	Maltese licensees not having a Morse qualification
9H6	Temporary	Licences for radio contests / experimental stations
9H7	Permanent	Gozitan licensees not having a Morse qualification
9H8	Temporary	Special events licences from the island of Comino
9H9	Temporary	Special events licences

The MCA would like to clarify that every call sign is unique. Therefore in processing applications for the grant of licences the MCA reserves the right to assign any vacant call sign it deems appropriate from the call sign assignment plan. Nonetheless, it may give due consideration to specific requests in relation to the assignment of call signs for radio contests / experimental licenses due to technical reasons.

Q11. Do you have any objections with the proposal to make available additional call sign prefixes? Please provide detailed justifications in case of disagreement.

Q12. Do you have any comments on the amateur radio call sign allocation table?

5.5 Other proposals to the licensing framework

5.5.1 Amateur radio examination

In order to obtain an Amateur Radio licence, an applicant must have successfully passed a national examination corresponding to the CEPT examination as established under the CEPT Recommendation T/R 61-02. This international standard has been unified across Europe and is based on electronic theory, regulatory terms and best practices in radio operation and safety.

In Malta, the amateur radio examination function was delegated to the Malta Amateur Radio League (MARL)¹¹ in 2004 and such examinations are being held on a regular basis. The MCA is of the opinion that this arrangement is working well consequently, it does not consider necessary to modify operational setup with MARL.

The MCA, taking into account the harmonised frameworks of the CEPT as provided in Recommendations T/R 61-01 and T/R 61-02, is proposing to fully adopt the amateur radio examination syllabus corresponding to CEPT Recommendation T/R 61-02 as described in its Annex 6. Through this proposal the requirements for sending and receiving Morse code signals will be reduced from 12 to 5 words per minute.

Q13. Do you have any reservations to the proposals concerning the examination process? Please provide detailed justifications in case of disagreement.

5.5.2 Harmonised Amateur Radio Examination Certificate (HAREC)

In implementing CEPT Recommendation T/R 61-02 the MCA would be required to issue a Harmonised Amateur Radio Examination Certificate (HAREC). The HAREC shows proof of successfully passing an amateur radio examination which complies with the European Syllabus for the HAREC. As stated in the same Recommendation, the HAREC facilitates the issuing of an individual licence to radio amateurs who stay in a country for a longer term than that mentioned in CEPT Recommendation T/R 61-01. It also facilitates the issuing of an individual licence to a radio amateur returning to his native country showing the HAREC certificate issued by a foreign Administration.

As stated earlier in this document, the MCA intends to fully implement the CEPT Recommendations T/R 61-01 and T/R 61-02. In this regard, it is proposing to fully implement the HAREC related conditions as described in Annex 1 of CEPT Recommendation T/R 61-02 with respect to the issuance of the HAREC. In particular, the MCA will be issuing the HAREC to persons who have passed a national examination for radio amateurs that meets the criteria set out in section 5.5.1 above.

¹¹ <http://www.9h1mrl.org/>.

In addition the MCA will be issuing, on request, the HAREC to those radio amateur who have passed the relevant national examination prior to the introduction of the harmonised examination syllabus.

Q14. Do you have any comments to the proposals concerning HAREC, as described under this section?

6. Consultation Framework

In accordance with its obligations under Article 4A of the Malta Communications Authority Act [Cap. 418 of the Laws of Malta], the MCA welcomes written comments and representations from stakeholders during the consultation period which shall run from the 19th December 2017 to the 2nd February 2018.

For the sake of clarity and ease of understanding, the MCA encourages stakeholders to structure their comments in order and in line with the section numbers and sub-section numbers used throughout this document.

The Authority appreciates that respondents may provide confidential information in their feedback to this consultation document. This information is to be included in a separate annex and should be clearly marked as confidential. Respondents are also requested to state the reasons why the information should be treated as confidential.

For the sake of transparency, the MCA will publish a list of all respondents to this consultation. The MCA will take the necessary steps to protect the confidentiality of all such material in accordance with the MCA's confidentiality guidelines and procedures. Respondents are however encouraged to avoid confidential markings wherever possible.

All responses should be submitted to the MCA in writing to the address below or via the indicated email address by no later than **12.00hrs. CET** on **Friday** the **2nd February 2018** and addressed to the:

Chief of Spectrum Management and Technology
Malta Communications Authority
Valletta Waterfront, Pinto Wharf, Floriana FRN1913, Malta

Tel: +356 21 336840 Fax: +356 21 336 846

Email: spectrum.mca@mca.org.mt

Extensions to the consultation deadline will only be permitted in exceptional circumstances and where the MCA deems fit. The MCA reserves the right to grant or refuse any such requests at its discretion. Requests for extensions are to be made in writing within the first ten (10) working days of the consultation period.