



# International Amateur Radio Union, Region 1

## **Elementary Level Licensing (ELL) in Region 1**

Following the Recommendation ZL23\_C3\_Rec\_27 adopted in Zlatibor, in October 2024 a questionnaire regarding Entry Level Licence (ELL) was sent to the Region 1 Member Societies.

The following 20 Member Societies responded: ARI, CARS, CRAM, CRC, DARC, IARC, IRTS, LRAA, MRASZ, NRRL, RL, RSGB, SARA (Seychelles), SARA (Slovakia), SARL, SRAL, SSA, UBA, URA, URE, VERON

## Annex 1

Has an Elementary Licence been implemented in your country?

Member Soc	Country	YES	NO
ARI	Italy		X
CARS	Cyprus		X
CRAM	Mali		X
CRC	Czechia		X <sup>[1]</sup>
DARC	Germany	X	
IARC	Israel	X	
IRTS	Ireland		X <sup>[4]</sup>
LRAA	Liberia	X	
MRASZ	Hungary	X	
NRRL	Norway		X <sup>[3]</sup>
RL	Luxembourg	X	
RSGB	UK	X	
SARA (Seychelles)	Seychelles		X
SARA (Slovakia)	Slovakia		X
SARL	S.Africa	X	
SRAL	Finland		X
SSA	Sweden	[X] Planned <sup>[2]</sup>	
UBA	Belgium	X	
URA	Andorra		X
URE	Spain		X
VERON	Netherlands		X

[1] A novice licence.

[2] Planned from 1<sup>st</sup> Jan 2025

[3] Q1 2026 ELL introduced in Norway.

[4] Q1 2026 Irish ComReg consultation.

## For those who answered with YES

### **Question Yes#1**

***Does the ELL implementation follow the principles and characteristics described in ECC Report 089?***

CRC

In Czech Republic Novice equals ELL

DARC

We introduced with 4 years of preparation the Class-N in Germany, which follows the CEPT recommendations.

IARC

Yes

LRAA

Yes

MRASZ

Not entirely

RL

Yes

RSGB

Report-89 is closely based on the early years of the UK foundation Licence introduced by our then regulator (the Radiocommunication Agency, now Ofcom) in late 2001.

While there remains a lot of good in ECC Report 089, it is now way behind the times. While maintaining the spirit of the Report, the UK Foundation Licence has moved with the times and we have had to adapt to the changing requirements of the national regulator (e.g. inclusion of material on EMF). Additionally, the national regulator has been in agreement with the changes that we have proposed and subsequently implemented.

SARL

Only in certain aspects. The emphasis of the South African Novice/Entry level licence is youth based and does not cover all the technical requirements as laid out in the ECC 089 report.

SSA

Yes

UBA

Fully compliant with report 089

## **Question Yes #2**

***Are there any notable deviations or exceptions from the principles and characteristics described in ECC Report 089?***

CRC

No

IARC

No

LRAA

No

MRASZ

Full compliancy was available until 2018. After this date, increasing the chance to pass exams for non-technical/young/elderly candidates the technical references were released consciously. The main focus has been shifted to the "on the air" operational trainings which generates significant increase in new ham operators entering into ham radio.

With the full "Report 089" compliancy the number of successful exams were very low.

RL

No notable deviations / exceptions detectable.

RSGB

As mentioned above our Foundation syllabus has moved with the times. In order to maintain a reasonable syllabus load, we have dropped a few topics that have been superseded by modern developments such as SDR, but maintained those older topics needed to prepare candidates for progression to a HAREC license (Full). Consequently, the content has increased a bit compared to the original concept.

We note that Report-89 is also very much based on physical training and practicals, whereas in recent times the UK has moved to a largely online training and exam-on-demand environment

SARL

Yes, only the very basic technical details are required. No in-depth knowledge is required. The main requirements/objectives are practical operating procedures, safety, rules and regulations.

The examination is biased on these three requirements. The technical side only equates to 30% of the exam paper. The ELL/Novice licence has a restricted band plan with limited power.

SSA

ELL is restricted to factory-built equipment -> no requirement on high voltage/ electrical safety knowledge

Minor regulatory issues:

i) Logbook no longer a requirement

ii) Broadcasting and music not explicitly prohibited (regulated in other legislation)

iii) Right of inspection no longer part of regulation.

UBA

Mostly compliant with report 089

### **Question Yes #3**

***Does the ELL training course in your country require practical tests***

CRC

Yes

DARC

Yes, we introduced for ELL and higher classes modern topics like SDR.

IARC

No

LRAA

yes

MRASZ

Morse test is the only practical test, all other parts of the exams are fully verbal.

RL

No

RSGB

Since 2020 (prompted by Covid), a practical element is no longer a requirement and this has been agreed with the national regulator. That said practical experience is still encouraged and supported. There are good reasons for these changes as many of the elements in the practical course and test no longer had the relevance that they might have had when ECC Report 089 was first produced.

Specifically, they are not compatible with online distance learning courses, which have made Foundation much more accessible. We had explored the possibility of online practical assessments, e.g. virtual transceiver, but considerable extra effort would be required to develop the software and to assess candidates, which could reduce availability.

SARL

Yes, there is a requirement from the South African national regulator that each candidate must pass a practical HF assessment. This covers transceiver setup procedures, safety regulations and operating principles.

SSA

No

UBA

Yes (practical test held by amateur societies)

#### **Question Yes #4**

***Are the ELL course and examination carried out by your national regulator or the member society? Please indicate whether the tests can be taken on-line or require physical attendance at a test centre. Can the test be taken on-demand?***

CRC

By the regulator. Require physical attendance – usually the term and place are agreed with regulator some time before and usually they do come to the agreed place. So it can be organized on demand – some lead time needed but they want to have at least a “few” applicants – not a single person. Delegated member of CRC is part of the test commission.

DARC

The courses are performed by DARC in presence or online (see [www.50ohm.de](http://www.50ohm.de)).

The exam is carried out by our national regular in presence at a test centre. There are no on-demand tests. A registration with the national regulator has to be performed beforehand

IARC

Done by regulator. Lots of flexibility – test on demand at MOC office. If large group – at nearby school.

LRAA

Yes. Test to be taken by physical attendance. There are no plans for “on-demand” format.

LRAA is responsible for the ELL activities not the national licensing authority.

MRASZ

The exam preparation courses are organized by MRASZ.

Examination schedule is handled by the national regulator. Preliminary registration needed for every exam session. All exams require physical attendance as the exams are fully verbal.

RL

The examination is carried out by our national regulator at his location. Courses are not mandatory.

RSGB

All UK amateur examinations (Foundation, Intermediate and Full) are carried out by RSGB subject to oversight of a committee that interfaces with the national regulator.

Most exams, >90% are taken online, in the candidates own home under remote invigilator; whilst a minority are in approved club exam centres with in-person invigilation. Paper exams are to be phased out except for special needs. Remote invigilated exams are 'on demand' subject to scheduling with a remote invigilator.

SARL

The examination is carried out by the member society. The exam is undertaken at an approved exam centre and the persons must attend. The exam may be taken at any time; however, this depends on the number of candidates. The member society via clubs run special courses as an when required.

SSA

Examinations carried out by SSA. On-line test, but under physical supervision by exam official. Mobile exam equipment - examinations can be carried out basically anywhere by authorized exam official. Examinations can also be performed on the official's laptop using the "Safe Exam Browser" software. Examinations are held "on-demand" when there is sufficient interest

UBA

ELL course and practical tests are held by amateur societies. Course can be on-line or on-site. Courses and exams have to be announced 1 month before to the regulator, but there is no minimum criteria (so for one candidate it is still valid). UBA even provides courses/practical tests at home for disabled candidates.

Theoretical exam is still held by the regulator: 30 questions (12 technical, 10 regulatory and 8 procedures) with at least 80% correct; The average success rate is about 75%.

## **For those who answered with NO**

### **Question No #1**

***Is there a plan for an ELL implementation in your country and is it expected to be based on the principles and characteristics described in ECC Report 089?***

ARI

There is still no plan for an ELL because too early; even the Novice Level of License is still to be defined in details (band privileges, callsign associated, processing of examination, etc...).

#### CARS

There are no current plans for an ELL implementation in Cyprus.

#### CRAM

No

#### CRC

No – the system is OK as is. The minimal level is low enough as it is and we – i.e. us CRC and the regulator both agree and nobody can see any space for further lowering of the requirements.

#### IRTS

Yes, there has been a response from the Amateur Radio community in Ireland and the National Society in the "Radio Spectrum Management Operating Plan 2025 - 2028 Response to Consultation"

More information can be found here:

Radio Spectrum Management Operating Plan for 2025 - 2028 Response to consultation on ComReg's Proposed Radio Spectrum Management Operating Plan for 2025 - 2028

<https://www.comreg.ie/publication/radio-spectrum-management-operating-plan-2025-2028-response-to-consultation>

In response to the proposed work items for the Radio Amateur Service, ComReg received thirty-seven responses from individual Amateur Station Licensees and thirteen responses were from clubs, organisations, groups or societies with an interest in the Amateur Radio Service.

ComReg's Assessment 3.25

As noted in paragraph 6.61 of the Consultation, ComReg proposed to begin a comprehensive review of the Amateur Service licensing regime (including a proposed novice licensing framework, coordination of automatic stations, the HAREC examination format, callsign allocations, etc.) during the 2025-2028 period. 47 3.26 With regard to the format of the HAREC examination, ComReg intends to consider other appropriate formats, such as on-line, for conducting the examinations to complement in-person examinations.

#### NRRL

Yes, work is ongoing on several fronts to establish a new licence. The teaching materials will be published on-line to ease adoption in schools. We have started to work with teachers to develop materials and

activities to simplify adoption in elective subjects related to technology. Our vision is that many teenagers will get an entry-level licence before they choose their field of further study.

## RSGB

### SARA (Seychelles)

The regulator has just recently sent us a draft framework which we are invited to comment on with a deadline of December 18th 2024. The draft has no tiered system. We are proposing a 3 tiered system based on what we understand and are examined remotely on by the RSGB in the UK and is accepted by the regulator as a fit means by which we can demonstrate competence and then be eligible for a local S79 Licence. Hence, there is no official entry level at the moment. An enthusiast can hold a Foundation, Intermediate or Full certificate of competence from the RSGB and the Seychelles regulator allows all 3 levels the same access to bands and powers which we disagree with based on what is used in the majority of developed countries.

### SARA (Slovakia)

Not now

### SARL

The regulator will only issue an entry or novice level licence to a person under the age of 20.

The licence is then also cancelled when that person reaches an age of 25. This is a unique situation within all the regions.

### SRAL

At this time we do not consider an Entry Level license necessary in Finland. We agree in principle on the proposals set forth in sections 1-4 of the Report. However, in the Finnish context the current Novice level certificate (perusluokka) fulfills most if not all of the requirements as it is today.

### URA

No

### URE

No

### VERON

No

## **Question No #2**

***Is there support or opposition for an ELL in your country from the national amateur community and what drives this view?***

ARI:

ARI is fully supporting the principle of introduction of ELL. As said, before ELL it is necessary that ARI follows up the introduction of Novice Level, where we see significant areas of operation and competence for ARI in support to Official Regulatory Body (MIMIT).

Lobbying for practical introduction of ELL will be consider after verification of success adoption of the Novice Level, and evaluation of room for ELL without excessive degradation of level of skillness requested for. As a matter of comparison, today the most deregulated level of collective telecommunication system in Italy is Citizens Band (CB) which is totally of free access (only requirement is Italian citizenship). Novice and next ELL topics are followed up by ARI directly with lobbying by its highest Representative Level (President of ARI).

CARS

The matter has not been discussed with the wider amateur radio community.

A discussion between the Board of Directors of the national society did take place a while ago. There was a positive sentiment in supporting the implementation of an ELL, assuming that an agreement could be reached on the operative privileges and/or limitations.

CRAM

Support but the regulator has no such a plan

CRC

There is no criticism of the current situation. The only think that is required by some clubs is how to organize operation of the students under supervision of A class licensed operator. It is sort of a "grey zone". It is not allowed or prohibited – we are trying to somehow specify it without success. How ever there was never a problem with the long years practise.

IRTS

As above in a recent response to consultation, respondents Views and ComReg's Assessment 3.17 In response to the proposed work items for the Radio Amateur Service, ComReg received thirty-seven responses from individual Amateur Station Licensees and thirteen responses were from clubs, organisations, groups or societies with an interest in the Amateur Radio Service.

#### NRRL

The amateur radio community in Norway is enthusiastic about the new licence class, recognizing the need for recruitment of young people and promotion of amateur radio in society.

#### RSGB

#### SARA (Seychelles)

I still need to call an Extraordinary General Meeting following the compilation of our response to the proposed draft. However, I think there will be support for the 3 tiered approach which we have been using to self regulate for several years now.

#### SARA (Slovakia)

We have 2 licence classes Novice and Extra. We need to change some licensing rules, but even that is very difficult. Creating a new class is unrealistic this time.

#### SARL

The local authority will not allow any other ELL besides the youth/novice licence. As indicated, this is limited to youth only.

#### SRAL

There is some support towards implementing an ELL from persons and entities promoting the need to increase the absolute number of amateur radio hobbyists at any cost. However, we are already experiencing issues regarding poor attitude: lack of interest in technical aspects, lack of interest in improving one's skills and disregard for rules and regulations.

#### URA

No

#### URE

The amateur radio community in Spain has shown some resistance to simplified entry-level licenses, with some voices arguing that a license with fewer technical requirements could lower the technical and operational standards within the amateur radio spectrum. However, there is no universal consensus, and some may view the ELL as an opportunity to attract younger, new operators.

#### VERON

There is very limited support for adding ELL from the amateur community. It is not so much a need: ELL is a solution to a problem that is not known. There are already opportunities to gain experience under supervision. ELL is therefore also not seen as relevant.

### **Question No #3**

#### ***Has your national licensing authority indicated a willingness to consider an ELL?***

##### **ARI**

still not. Governmental Regulatory Body (MIMIT) , in addition to work for introduction of Novice Licence, is in full transformation phase with adoption of automated bureaucratic processes (Licence applications, Fare collection, dedicated services for ham community such as Special Calls for Contesting and special events), with opportunity to delegate part of operation and processes to officially recognized Amateur Radio Society,

##### **CARS**

The licensing authority in Cyprus has not been willing to discuss the implementation of an ELL license. Among others, the main reasons cited for not implementing ELL:

- A need for changes to the law governing amateur radio, thereby introducing alternative licenses.
- A need for changes to the licensing authority procedures to handle multiple level licenses.
- A need for changes to the licensing authority IT systems, to handle multiple level licenses.
- The lack of staff at the licensing authority, required to manage the multiple level licenses, and most importantly the examinations that would be required.
  - There is lack of the required knowledge within the licensing authority to hold a practical exam, and
  - There is unwillingness to allow the National Society any role in the examination procedure.

##### **CRAM**

Yes

##### **CRC**

Our Novice is ELL

##### **IRTS**

Yes, subject to resourcing availability and as set on in Consultation 24/65, ComReg intends to begin a comprehensive review of the Amateur Service licensing regime (including a proposed novice licensing framework) during the 2025-2028 period.

##### **NRRL**

After considerable work on different levels, the idea of an ELL has gained support from the Norwegian regulator

SARA (Seychelles)  
Not yet

SARA (Slovakia)  
No at the moment.

SARL  
Regulator will only allow entry level exams for youth under the age of 20.

SRAL  
The national regulator Traficom has not expressed a clear opinion in the matter, however their main concern is the resource requirements a new license class will impose on their personnel. Currently there is already a lack of proper resources to monitor frequency use and adherence to rules and regulations.

URA  
No

URE  
As of today, there is no public information available indicating a concrete plan from the Spanish administration (the State Secretariat for Telecommunications and Digital Infrastructures) to implement an Entry-Level License based on the principles of ECC Report 089. Spain adheres to the standards of Recommendation T/R 61-01 for amateur radio licenses but has not adopted a license with the most basic characteristics as described in ECC 089.

VERON  
The Dutch Authority for Digital Infrastructure (RDI) is responsible for the execution and enforcement of telecommunications. RDI indicates that it wants to stick to the current Novice and Full licenses and not add another one in the form of an ELL. The novice (05)06 CEPT level seen by RDI as the minimum necessary (entry) level.

## ECC Report 089

### *Question Report 089*

***This report was published in 2006. Do you consider the details relevant in 2024?***

ARI

there is risk that in Italy the Syllabus for ELL is considered equivalent to possible one for Novice Licence

CARS

The suggested syllabus as presented in ECC Report 89 could be limited by removing some of the technical content. More specifically the following could be removed:

#### 2. Technical Content

##### a. Basics

- ii. Electrical circuits
- iii. Power and resistance
- iv. Ohms Law

##### b. Transmitters

- i. Block diagram of a simple transmitters
- ii. Modulation types

##### c. Receivers

- i. Simple receiver and detector

There is a general feeling that the above do not really offer any added value to someone trying to enter the hobby at an Entry Level.

As the above stand, examination bodies / licensing authorities could interpret them with the content contained in the HAREC, especially by those authorities that are not deeply knowledgeable about amateur radio.

CRAM

No

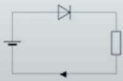
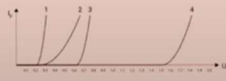

CRC

Yes

DARC

We considered the contents of the report, but created an own custom syllabus that contains the relevant information for ham radio today:

# Tech. Exam Contents

Class N	Class E	Class A
Introduction and overview	Qualitative understanding of the relationships	In-depth understanding, but NOT an engineering degree
Very simple calculations	Simple calculations	Complicated calculations
Apply simple formulas	Converting Formulas	Combining multiple formulas
<b>Example:</b>		
<ul style="list-style-type: none"> <li>▪ EIRP</li> <li>▪ Circuit symbols, circuit</li> <li>▪ Waterfall diagram</li> <li>▪ Computer control</li> <li>▪ ...</li> </ul>	<ul style="list-style-type: none"> <li>▪ PEP and protective distances</li> <li>▪ Measuring and reading</li> <li>▪ Digital processes</li> <li>▪ Simple amplifiers</li> </ul>	<ul style="list-style-type: none"> <li>▪ Semiconductor physics</li> <li>▪ Power Amplifier (PA)</li> <li>▪ Digital Signal Processing (Shannon)</li> <li>▪ ...</li> </ul>
		

## Contents of training material class N

- 1. Getting Started:**  
Call Sign, Spelling Alphabet, Operations, Training Radio Operations, Open Language, Radio Communications Only with Amateur Radio Stations, Messages for Third Parties, Commercial Use, HAM-Spirit
- 2. Frequency and wave propagation**  
Waterfall Diagram, Frequency, Frequency Ranges, Primary and Secondary Radio Service, IARU Band Plans, Radio Horizon, Sporadic-E, Tropospheric Inversion, Ionosphere
- 3. Amateur radio stations**  
Personal Call Signs, Call Sign Accessories, Training Call Signs, Remote Stations, Club Stations, Special Events, Remote Controlled and Automatic Stations, Relay Radio Stations, Beacons, Link Links, Satellites, Extraterritorial Stations, Experimental Studies
- 4. International radio operation**  
Country Codes, ITU Regions, DX, Sparks Abroad
- 5. Modulation**  
AM, Continuous Wave, Single Sideband, FM, Bandbreite
- 6. Digimodes**  
Digital Voice, Computer Control, Telegraphy, Morse Telegraphy, Radio Teletype
- 7. Abbreviations**  
Operational Abbreviations, Q Keys, Maidenhead Locator
- 8. Antennas and Cables**  
Antenna shapes, polarization, coaxial cable, adaptation and SWR, vehicle installation, personal protection, equipotential bonding and lightning protection, power cables, building law and liability
- 9. Transceiver**  
Receiver Structure, Attenuator, Transmitter Structure, Output Power, Squelch, VOX, RIT, Unwanted Emissions, Harmonics, Avoid Interference, Immunity
- 10. Operations**  
QRP, pile-ups, split operation, contest, emergency radio, SSTV
- 11. Logbook and QSL Cards**  
Logbook, QSL cards
- 12. Power supply**  
Electrical voltage, electric current, electrical current hazards, power supply, batteries and accumulators
- 13. Components and Circuits**  
Do-it-yourself law, conductors and non-conductors, circuits, semiconductors, measuring instruments, ohm's law, resistor color code, power, circuit symbols and components
- 14. Laws and regulations**  
Radio service, radio station, amateur radio service, amateur radio station, examination, approval, address and change, fees and contributions, secrecy of telecommunications and prohibition of interception, violations and consequences

## IARC

Some of the details are relevant but most of Israeli candidates jump over class C (ELL-beginner) directly to Class B (General), and few sometimes later take the tests to Class A (Advanced).

IRTS -

LRAA  
yes

MRASZ -

The content is relevant however this content reveals only high-level slogans without real details. Significant interpretation/explanation is

needed for each subjects/topics which make the introduction and maintenance difficult.

NRRL

Yes, but we note that the report could emphasize arguments related to STEM recruitment and societal preparedness

RL

Yes

RSGB

We fully support the aims of the Report (and indeed one of our volunteers was a key contributor in CEPT WGRA in 2005 for its creation). However as indicated there are a number of areas where some form of refresh or more thorough update of the report is desirable. It could then better account for societal and technology changes, accessibility, special needs and STEM benefits.

For example with the modern advent of online training and exams, its emphasis on physical training/ exams which can be less accessible needs review, including a reference to CEPT ECC Recommendation 14(05). Ideally the mix of topics in the syllabus should also be reviewed. The premise in the UK implementation is to be able to operate without causing undue interference or incurring safety issues; and thus less need for compulsory technical content compared to higher licence levels

RL

SARA (Seychelles)

We are driven by the fact that we are successfully being awarded local licences following submission of an RSGB certificate of competence which is based on remote online examination adhering to the UK regs

SARA (Slovakia) -

SARL -

SRAL

**Regarding section 5.1**, the situation described in the Report about licensing lasting up to one year does not correspond to the situation in Finland. We have a wide variety of licensing courses with Novice level courses being available throughout the year from many local amateur radio clubs. In addition, SRAL as the national amateur league operates an online study environment based on Moodle with human mentoring available to complement the study material. License proficiency exams are also available at a very short notice, being offered by SRAL-appointed examiners around the country. With this availability in both

courses and exams, it is our view that the current Novice level certificate and its attainability is sufficient to fulfil the requirements set forth in the Report.

**Regarding section 5.2**, the Report does not propose to require understanding in digital radio modes based on frequency modulation such as 4FSK and software protocols built on top of these modulation techniques. There is also no mention of digital speech modes/applications such as DMR, which requires additional knowledge in software-level aspects of the protocol, its operation in an IP-based network, national and international networks linking DMR repeaters and so on. In the Finnish context there is a major community of amateur radio hobbyists built around DMR and other digital speech modes in VHF and up.

It is our view that leaving this aspect of the hobby completely out of the proposed syllabus greatly decreases the ability of new hobbyists to engage in the local amateur radio community. Currently around 20 % of Finnish amateur radio hobbyists have a

DMR ID, and are able to participate in this aspect of the hobby.

Additionally, many UHF FM repeaters in the 70 cm band are actively being replaced by digital DMR technology, meaning the availability of repeaters to new Entry level hobbyists would be greatly reduced in the near future.

It is also our view that regarding practical aspects of operation, basic radio operation, knowledge of local laws and regulations, knowledge of basic operation, customs, basic values of the hobby, responsibility as a hobbyist and respect toward others in the bands and in the community, the requirements should be the same for all license classes.

The Report fails to mention any aspects of attitude education. It is our view that this is a major defect in the Report and should be corrected before any implementation of the Entry level license class is considered.

In the Finnish context, we are already having problems with hobbyists having a lack of interest toward the basic values of the hobby, lack of interest in attaining a higher license class, lack of interest toward technology and improving of one's technical skills, lack of interest toward responsible behaviour both in the bands and in the local community, general lack of respect toward others and a lack of respect for the local laws and regulations. We feel that the Report should propose to require, in addition to knowledge of local laws and regulations, knowledge of the basic values of the hobby and willingness to adhere to these values.

**Regarding section 5.3**, the Report contradicts itself in both requiring wide access to the spectrum with power levels both restricted enough to avoid EMC issues while at the same time allowing wide area communication. There is also a proposal to have no restrictions regarding operating modes, however as expressed above, the Report fails to propose to require knowledge on frequency modulated digital modes and digital speech applications such as DMR.

The Report proposes national administrations to have separate call sign pools for Entry level licensees. In the Finnish context, this may not be viable as the local regulator Traficom is lacking human resources in the department responsible for amateur radio licensing. Any proposals made by SRAL to the local regulator should not increase the administrative burden of the local regulator, as these proposals would be difficult to implement. Additionally, the local regulator lacks human resources in frequency monitoring, meaning any new access to the band and any new access restrictions should be easily monitorable and enforceable by both the local regulator and the amateur radio community. This monitoring process should be more accurately described in the Report.

**Regarding section 5.4**, the current situation in Finland is already fulfilling most if

not all of the requirements set forth in the Report:- SRAL is coordinating amateur radio license courses in Finland.

- SRAL has produced teaching and study material for clubs to use in their courses.
- SRAL is operating an online study environment based on Moodle with human tutors available for online students.
- SRAL is facilitating online courses based on the Zoom conference application.
- SRAL is operating a national network of proficiency examiners under appointment from the national regulator Traficom.
- SRAL is requiring local clubs using its teaching material to actively participate in the online Moodle study environment, and for the clubs and their teachers to accept and implement its basic values and defined course content.
- SRAL has a national working group to oversee the activities of appointed proficiency examiners and maintain the question banks used in national proficiency exams.
- SRAL is operating an online proficiency examination environment used in all national proficiency exams (AR-X).
- National proficiency exams are based on multiple-choice question banks and are thus able to be easily and quickly checked, leading to a short time from exam to the actual license being issued to an applicant.
- National proficiency exams are readily available at a very short notice around the country.

In conclusion, SRAL states that the local situation in Finland is already mostly if not entirely consistent with the requirements described in Report 089. Thus we see no additional benefit from implementing a third level of license, as it is described in Report 089, as the Finnish Novice level license is easily attainable, has ample

course material and courses available as it is, and examinations along with updated question bands and an established network of examiners with proper monitoring has already been established.

SSA

YES – the syllabus is sufficiently “vague” to allow for introduction of new technologies, e.g. digital transmission modes.

URA

No comment

URE

ECC Report 089 remains relevant in 2024, particularly in the context of expanding amateur radio licensing to a broader and less technically specialized audience. While certain technical aspects have evolved since its publication in 2006, the fundamental principles regarding the training and evaluation of basic-level amateur radio operators continue to be applicable.

VERON

Report 089 is seen as less relevant. The intended goal of getting young people interested in science and technology is not achieved by offering exams with lower standards. Interest is actually aroused by offering (young) people a challenge; this is also likely to bring out the best in students.

## Further Information:

### *Further Info #1*

***Please provide a link to relevant information on the website of the national regulator and your member society.***

ARI -

CARS -

CRAM -

CRC -

DARC

- [www.50ohm.de](http://www.50ohm.de) holds all the information to become a HAM in Germany, including all teaching material (text, books, slides, videos etc).
- <http://bnetza.de/amateurfunk> holds all the information from our regulator.
- This talk (English) gives an overview what we have done:  
[https://www.youtube.com/watch?v=2\\_piO0p-2zo](https://www.youtube.com/watch?v=2_piO0p-2zo)

IARC

- Regulator MOC - <https://www.gov.il/he/service/radio-amateurs-certificates>
- IARC on-line course website (basically it's free) - <https://courses.iarc.org/>

IRTS

- <https://www.comreg.ie/media/2024/12/ComReg-2499.pdf>
- Perhaps of greater interest is ComReg's analysis of the responses which can be found here: <https://www.comreg.ie/publication/radio-spectrum-management-operating-plan-2025-2028-response-to-consultation>
- All the responses received can be found here:  
<https://www.comreg.ie/publication/non-confidential-submissions-to-consultation-24-65-radio-spectrum-management-operating-plan-2025-2028>
- Of the 67 responses received, 37 responses came from Radio Amateur stakeholders. The radio amateur service is covered in section 3.4 pages 44 - 48

LRAA

This is the national regulator's website <https://ltair.org/>. Amateur radio is not even listed on the national regulator's service listing. There is a unit that is responsible for Amateur Radio that was part of the original regulatory agency, but it seems not to be fully recognized by the managers of the national regulator. This is the reason it takes months before the licenses are issued. Please be informed that LRAA does not have a webpage to date. We will have to create one soon.

#### MRASZ

Further Information:

- <https://njt.hu/jogszabaly/2013-15-20-3H>
- <https://mrasz.hu/nmhh-informaciok>
- <https://mrasz.org/information-for-visitors-to-hungary/frequencies-used-in-hungary>
- [https://stir.nmhh.hu/publicview/?p=d&name=3melleklet&lang=1#jump\\_to\\_3557](https://stir.nmhh.hu/publicview/?p=d&name=3melleklet&lang=1#jump_to_3557)

#### RL

National regulator: <https://web.ilr.lu/FR/Particuliers/Frequences-radioelectriques/Certificats-doperateur>

Member society: <https://rl.lu/regulations/>

#### RSGB

Please provide a link to relevant information on the website of the national regulator and your member society.

Ofcom Amateur Licence Information:

<https://www.ofcom.org.uk/spectrum/radio-equipment/amateur-radio-info/>

RSGB:

- Foundation: <https://rsgb.org/main/clubs-training/for-students/foundation/>
- Licensing: <https://rsgb.org/main/operating/licensing-novs-visitors/uk/licensing/>

For information the UK has a three tier licence system:

UK Licence	CEPT Equivalent	Maximum Power
Foundation	Entry-Level (Report 89)	25W
Intermediate	CEPT Novice	100W
Full	CEPT Radio amateur/HAREC	400 / 1000W

In the UK, Foundation licensees have access to many but not all, amateur allocations, whilst Intermediate and Full have additional allocations and privileges. Only UK Full Licences able to operate under T/R61-01 reciprocal licensing

SARA (Seychelles)

We are driven by the fact that we are successfully being awarded local licences following submission of an RSGB certificate of competence which is based on remote online examination adhering to the UK regs. Please add any additional views or information you might have that could be relevant to the discussion of ELL.

The current draft framework has a lot of improvement opportunities and we will try to convince the SCRA to see out point of view. If there is any one at the IARU-R1 that could help us we may need to call on that if need be.

SARA (Slovakia) -

SARL

ELL details can be found at the following link, under Class-B – ZSU Licenses. <http://www.sarl.org.za/public/licences/rae.asp>

SRAL -

SSA

<https://examen.ssa.se>

URA

<https://www.ura.ad/Legislacio.html>

URE -

VERON -

## **Further Info #2**

***Please add any additional views or information you might have that could be relevant to the discussion of ELL.***

ARI -

CARS

During the discussion of the national society, the matter of the local tendency of persons not to abide by the laws and regulations was discussed over and over again (mediterranean mentality). In general, if an ELL was restricted by either power or by frequencies, persons would probably not abide, hence what would be the driving force for someone to upgrade to HAREC? The discussion ended with the possibly of providing the ELL with a time limit (e.g. 2-3 years) by which time one would be required to proceed to the Novice and/or HAREC level licenses. It should be noted that neither ELL (ECC Report 089), nor Novice licensing (ERC Report 32), have been implemented by the licensing authority in Cyprus. So far, there has been resistance by the licensing authority to implementing either, for the reasons cited above.

CRAM -

CRC -

DARC

More than 80 people worked on the creation of the German ELL. We developed several tools and we are willing to share them and our experience on an European level. Exam questions and all the pictures are published under an open-source license.

IARC -

IRTS

It is very encouraging to see the high level of responses from the amateur radio community, both clubs and individuals alike, and the National Society IRTS.

This raises the profile of amateur radio in Ireland and indicates to COMREG the importance of our hobby and it's responsibility to treat the hobby seriously, consult with IRTS on a regular basis and regulate accordingly.

It can be seen, from the standard of submissions, that there are great opportunities to promote technical training and careers by fostering the hobby, particularly among youth. COMREG should recognise this from the many submissions.

LRAA -

MRASZ

The recommendation is excellent. The main amendment might be to make the abstraction levels more concrete and uniform. This might generalize the topics. It is very important to keep the main focus on to support the youngster and elderly generations who might not have that in depth mathematical and/or physical education or understanding in the deep details of the given area.

MRASZ is partner in any rework of the Report 089 ELL implementation, but only the way described above.

RSGB

Given its age (and a deeply unsuccessful IARU proposal in 2018), priority should be given to a very simple refresh of Report-89. We recognise that any CEPT work item or revision requires consensus and support from the CEPT Admins. Therefore do not advocate a major overhaul at this point in order to achieve a positive start to the process...

For example IARU could propose to modernise some text to allow for online training/exams (which also makes them more accessible), lesser need for practical tests and a reference to ECC Rec 14(05) for exams for those with disabilities / special-needs. We note that even small changes would also refresh the style/template of Report-89, making it seem more appealing and relevant

Of course should the opportunity arise for more detailed modernisation of its syllabus content, we would welcome this and would be delighted to offer some support

References:

ECC Report 89 A Radio Amateur Entry Level Examinations and Licence, October 2006

ECC Recommendation (14)05 Amateur Radio Licence Examinations for Persons with Disabilities - October-2014

SARA (Seychelles)

SARA (Slovakia) -

SARL

Currently we only have around 200 to 220 people per year who write the main RAE, Class A.

Of this, the failure rate is approximately 6%. These numbers will not gainfully increase by having another entry level licence. The administration effort and cost outweigh any gains at this point in time

SRAL

Our view regarding ECC Report 089 is described above.

Regarding entry-level licenses as a whole, it is the view of SRAL that the Novice-level proficiency exam in Finland is already lenient enough to facilitate an easy entry into the hobby. We view the role of local amateur radio clubs vital in engaging new hobbyists and successfully importing them into the local community.

A person with a call sign, who is not engaging with the community, who lacks basic knowledge in the technical aspects of amateur radio, has a bad attitude toward rules and regulations and a general lack of respect toward others in the amateur radio community is not the type of ham we want to have.

Without proper role models, engagement, mentoring and elmering there is a clear, proven risk of the aforementioned issues happening. We do not view it as necessary to increase the absolute numbers of hobbyists, if that means the general "quality" of hams degrades. That will damage the reputation of the community in the eyes of our partners in the public sector.

We agree that steps should be taken to better facilitate new hobbyists in starting with amateur radio. In the Finnish context, we would rather need help engaging new licensees, so that they would be able to find their personal interests within the hobby, and become active members of their local clubs.

However, SRAL and many local clubs suffer from lack of money and active hobbyists/elmers, which has made it difficult to engage new licensees. Furthermore, we see that having more resources (in terms of money and people) for arranging courses and for marketing the hobby, either in in-person events or online, would be more beneficial to Finnish amateur radio than adding yet another license class.

URA

No comment

URE

Recommendation T/R 61-01 regulates amateur radio licenses in Spain within the European context but does not introduce an entry-level license such as the ELL.

Regarding its implementation, Spain has not taken official steps towards this type of license. On the contrary, it eliminated such licenses several years ago.

VERON -