

**Document Name: Consultative Document on *Framework for the Authorisation of Amateur Radio Services* (single round) (September 2020)**

**Appendix I. Decisions on Recommendations (DoRs) Matrix for Targeted Stakeholder Consultation**

The following summarises the comments and recommendations received from the targeted stakeholder consultation, held on June 03, 2020, on the draft *Framework for the Authorisation of Amateur Radio Services* (the Framework). The decisions made by the Telecommunications Authority of Trinidad and Tobago (the Authority) have been incorporated in the revised consultative document. The Authority wishes to express its thanks for all comments and recommendations received from the following stakeholders:

- i. International Amateur Radio Union (IARU) – Mr Tommy Chen
- ii. Naparima College – Mr Devanand Gosine
- iii. Office of Disaster Preparedness and Management (ODPM) – Mr Dennis Marcelle
- iv. Presentation College San Fernando – Mr Nigel Sookdeo
- v. Radio Emergency Associated Communications Team Trinidad and Tobago Council (REACT Council) – Mr Ravindranath Goswami
- vi. The University of the West Indies (UWI) – Dr Kim Mallalieu
- vii. Trinidad and Tobago Amateur Radio Society (TTARS) – Mr Noel Donawa and Mr Jeffery Austin
- viii. Water and Sewerage Authority (WASA) – Mr David Drakes

**Note: The tabulated comments and recommendations reflect written submissions from the listed stakeholders, as well as some oral submissions which are denoted by an asterisk (\*).**

Item	Section	Section Title	Stakeholder	Comments	Recommendations	TATT's Decision
1	0	General Comments/Recommendations	Mr David Drakes (WASA)		Beacons and repeaters should be included in the list which the TATT publishes (in MS Excel) pertaining to registered amateur operators on its website.	The Authority recognises the benefit that having access to this will bring to the amateur community. Therefore, information about repeaters and beacon stations licensed by the Authority, including the name of the

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						licensee, the assigned frequency/frequencies and the location of the station(s), will be published on the Authority's website.
2	1.3	Background	Ravindranath Goswami (REACT Council)	<p>The amateur radio service is recognised to involve experimental work within the framework.</p> <p>Amateurs conduct technical investigations, and it is well established internationally that the amateur community utilise re-purposed equipment. This is done for several reasons, including economic consideration, where used commercial equipment is employed to produce home-brew experiments. Amateur radio's role in disaster communications is duly recognised in the framework.</p>	<p>In this section, REACT recommends explicitly acknowledging other parts of the definition, alluded to in Section 1.9. It is suggested that the self-training, intercommunication, and technical investigations in radio technique also be stated.</p> <p>REACT suggests that the amateur radio service be recognised for suitable treatment, one that is differentiated from the commercial services, with the attendant flexibility and latitude to facilitate the technical investigations aspect of the service as well as to be able to operate in disaster scenarios. This concept should also apply when the Authority considers requests for Equipment Certification, particularly when evaluating specifications in relation to the transmit portions of the bands.</p>	<p>The Authority agrees with this recommendation. The first paragraph of the background of the Framework has, therefore, been revised to include the three fundamental elements of amateur services, as follows:                      "...to undertake non-commercial radiocommunications activity including self-training, intercommunication and technical investigations"</p> <p>The Authority agrees with REACT's recommendation. Amateur operators can conduct technical investigations, as stated in clause A10 of the amateur licence. The Authority will be flexible in its approach to accommodating this element of the amateur radio services. This will be reflected in how the Authority processes equipment certification applications from amateur operators for commercial equipment to be used for home-brewed experiments or repurposed to operate on the bands allocated to amateur radio services. Such applications will be assessed on a case-by-case basis. The Authority's <i>Equipment Standardisation and Certification Framework for the Telecommunications</i></p>

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						<i>and Broadcasting Sectors of Trinidad and Tobago</i> <sup>1</sup> will be updated to reflect this new approach.
3	1.3	Background	Ravindranath Goswami (REACT Council)	<p>In referring to the amateur radio service, it is stated: <i>“This includes the training of young people in radiocommunications.”</i></p> <p>REACT as an organisation has within its membership a youth arm, referred to as Junior REACT, for persons under the age of 18. Youth members can study for and take the ARRL exams, become licensed with a call sign for use in the US; however, they are unable to obtain a local license/call sign.</p>	<p>REACT advocates for the youth and encourages the Authority to take the necessary steps to remove the impediments so that persons under 18 can obtain an amateur radio license.</p> <p>Alternately, an adult, such as a parent or guardian who is an amateur, can sign on behalf of the minor, allowing issuance of a call sign.</p>	<p>The Authority recognises the importance of youth involvement to the amateur community and section 3.4 of the Framework has been revised as follows: “...There is no minimum age requirement for eligibility for an amateur operator/station licence. Once an individual obtains certification in accordance with section 3.7, he/she can be issued a licence by the Authority.”</p> <p>Additionally, section 3.4 now includes: “...the Authority will issue amateur radio licences to a parent or legal guardian on behalf of the minor seeking to become a licensed amateur operator. The parent or legal guardian will be responsible for ensuring that the minor, when operating the amateur station, adheres to provisions of the Act, the licence and any other relevant regulations.”</p>
4	1.5	Relevant Legislation	Mr Nigel Sookdeo (Pres. College San Fernando)	(1) In Framework Section 36(1) No person shall (c) establish, operate or use any radio communication service on board any ship, aircraft, or other vessel in the territorial waters or	Both sections deals with establishing/installing and using a station onboard a vessel however a degree of conflicting requirements are given. The first instructs the licensee to get a licence granted by the Authority. No mention of	These passages were extracted from two documents. The first is from the Telecommunications Act, Chap. 47:31 (the Act) and the second is from the licence document issued to amateur operators. The scopes of both documents are distinct and hence the difference in

<sup>1</sup> <https://tatt.org.tt/Portals/0/Documents/Equipment%20Standardization%20Framework.pdf>  
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				<p>territorial airspace of Trinidad and Tobago, other than a ship of war or a military aircraft or satellite registered in Trinidad and Tobago. Without a licence granted by the Authority.</p> <p>(2) In Licence booklet (page 8) Section: Location Sub section: Vessels (i) Where the Licensee operates on a vessel, the Licensee shall: (a) install, use or make changes to the station only with the written permission of the vessels master.</p>	<p>permission from the vessel master.</p> <p>The second does not mention anything about getting a license from the authority (whether there it is a special licence) but mentions getting permission from the vessel master.</p> <p>There should be congruency in both these sections.</p> <p>This information should be clear, it is especially important for local Amateur Radio operators to understand so as to adhere to the proper requirements regarding stations on vessels. Particularly for those amateur radio ops working offshore on ships and boats etc.</p>	<p>specificity.</p> <p>Section 36(1)(c) of the Act prescribes that a licence is required to establish, operate or use a radiocommunications service on board any ship, aircraft, or other vessel in the territorial waters or territorial airspace of Trinidad and Tobago. This is an overarching requirement for establishing, operating or using any type of radiocommunications service on board a vessel. The requirement for permission from the vessel master is a specific requirement that only applies to the operation of certain radiocommunications services on board a vessel. Hence, it was not included as an overarching requirement in the Act.</p> <p>Condition A32 of the licence document issued to amateur operators treats with the location of operation of an amateur station. Specifically, condition A32 (d) states that an amateur may operate while maritime mobile. Based on this condition, amateur operators meet the requirement of section 36 (1) of the Act by obtaining an amateur operator/station licence. Thus, there is no need to include in the licence document a condition specifying that a licence is required to operate an amateur station on board a vessel.</p>

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5	1.6	Review Cycle	Ravindranath Goswami (REACT Council)	The revision cycle is stated to be periodic.	It is recommended that a specific period be given. For example "The Authority will review this document at least every five (5) years...". This will create a compelling revision schedule to ensure that the framework is kept relatively current and not subjected to any arbitrarily long time for review. Stating it this way will also facilitate more frequent revisions should it become necessary.	All the Authority's frameworks are written to be applicable for the foreseeable future and are periodically reviewed to assess relevance based on changes in the industry. This approach is reflected in section 8 – Review Cycle of the Authority's <i>Procedures for Consultation in the Telecommunications and Broadcasting Sectors of Trinidad and Tobago</i> (January 2010).  Notwithstanding this, the Authority will consider this recommendation in light of the public consultation on its procedures for consultation currently underway during the period August to October 2020.
6*	1.9	Definitions	Dr Kim Mallalieu (UWI & UWI ARC)		Some of the items are not definitions. They should be removed or revisited accordingly.	The Authority agrees with this recommendation. This section has, therefore, been revised to ensure all the definitions are appropriate and that only terms that require a definition are included.
7	1.9	Definitions	Mr Nigel Sookdeo (Pres. College San Fernando)	Commercial companies and organisations	The Authority should be cautious of commercial entities bearing gifts of good faith such as providing emergency communication availability etc while trying to encroach on Amateur radio frequencies for pecuniary and or other non-amateur radio interests.	The Authority agrees with the recommendation for a cautious approach regarding this sensitive matter. The Authority is currently working with the ODPM, Tobago Emergency Management Agency (TEMA) and other emergency relief agencies (like REACT Council) in drafting the National Emergency Communications Plan (NECP). This plan recognises the importance of amateur radio services in emergency communications and identifies the use of amateur stations as a secondary

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						<p>communications system, to supplement the primary emergency communications systems. Consequently, the Authority's authorisation process accommodates such emergency relief agencies, by issuing the appropriate amateur radio licence to operate amateur stations as secondary emergency communications systems.</p> <p>Emergency relief agencies are not authorised to use their amateur station(s) for commercial purposes.</p>
8	1.9	Definitions	Ravindranath Goswami (REACT Council)	<p>Some of the definitions carry a reference, e.g. ITU 2016. Others, while using the ITU Radio Regulations 2016 definitions, do not specifically state such.</p> <p>The definition of a repeater is referenced to the FCC's Office of the Federal Register 1989. Sections 3.1.4 Special Operation Station Licence and 3.6 Call Signs and Identification of Stations, of the framework, makes provisions for regulations that govern repeaters.</p>	<p>For consistency, include references for each definition.</p> <p>Consideration should be given for devices that may appear to be included in the stated definition but may not be subjected to provisions targeted at repeaters, e.g. Cross-band repeat, and duplex hotspots.</p>	<p>The Authority agrees with the comment and recommendation regarding referencing the definitions. Section 1.9 has been updated and all definitions are referenced and cited accordingly.</p> <p>The Authority agrees with these comments and recommendations. The definition concerns all types of repeaters; however, frequency coordination and the licensing of amateur repeater stations apply only to public repeaters and not personal, low-powered repeaters such as cross-band repeaters. Section 3.1.4 of the Framework has been updated to indicate the types of repeaters that require frequency coordination.</p>

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10*	3.3	Licence Term and Licence Renewal	Dr Kim Mallalieu (UWI & UWI ARC)	<p>Payment for renewal of a licence, three months before expiry, is onerous. Also, an ex-post regulatory approach will be far more palatable than an ex-ante approach, regarding taking action against non-compliance with licences terms and conditions. Limiting the licence term, for the opportunity to review the conduct of licensees, to determine if the renew the licence or not, is not recommended.</p> <p>Recognising the importance and value of amateur radio services, we should encourage adoption and use, by getting the youth involved.</p>	<p>TATT should consider giving amateur licensees the option to pay for a longer term, such as 10 years, even if there is additional charge for this option.</p> <p>An ex-post approach should be adopted, where action can be taken anytime during the licence term, if a licensee breaches the terms and conditions of the licence.</p>	<p>The Authority wishes to clarify that the renewal application must be made within three months of the expiry date and, therefore, payment can be made within the three month period prior to the expiration of the licence.</p> <p>The Authority recognises the inconvenience to amateur licensees of having to pay licence fees frequently. The current three-year licence term limits the frequency of payments. Therefore, the licence term has been revised to 10 years (see section 3.3 of the Framework) and, as a result, amateur licensees will be allowed to pay up to 10 years' licence fees.</p> <p>Should the licence fee change during the term of a licence, the difference in the licence fee will either be paid to TATT by the licensee or refunded to the licensee by TATT.</p> <p>Based on section 39 of the Act, the Authority can exercise either an <i>ex post</i> or <i>ex ante</i> approach to addressing breaches of licensing terms and conditions. Regarding amateur licences, both approaches are used, depending on the nature of the breach. An <i>ex ante</i> approach is typically used for breaches with respect to the payment of licence fees, while an <i>ex post</i> approach</p>

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					<p>TATT should consider the reduction of fees for youth (persons under 25).</p> <p>TATT is urged to set up online payment and online accounts, so licensees can see the history of all of their transactions with TATT.</p>	<p>is used for serious breaches of technical operating limits.</p> <p>The Authority recognises the benefits of encouraging youth involvement in amateur radio services, by having reduced fees for persons under 25. However, the licence fees were established in the Telecommunications (Fee) Regulations, which has a very extensive process for amendments. Therefore, the Authority cannot consider a reduction in the licence fee for youths during this review cycle of the Framework. It should be noted that the fee is derived from an activity-based costing exercise to recover administrative costs, and a reduction of \$100.00 per annum of the fee will represent a cost to the Authority.</p> <p>The Authority is pleased to advise that, since April 2020, it has been accepting online payments for application and licence fees. The Authority is also in the process of establishing an online portal for licence applications, where applicants and licensees will have access to up-to-date information on the status of their applications and licences. The public shall be notified when the online portal is operational.</p>
11	3.3	Licence Term and Licence Renewal	Mr Nigel Sookdeo (Pres.	Requesting renewal term to be extended.	With an option of (1) year (3) years and (5) years.	From our understanding of this comment and recommendation, the Authority agrees with longer

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			College San Fernando)			licence terms, and section 3.3 of the Framework has been amended to provide for a licence term of 10 years.
12	3.3	Licence Term and Licence Renewal	Mr Nigel Sookdeo (Pres. College San Fernando)	To make online applications and renewal of licenses possible.	To facilitate time constraints of persons working abroad for long periods, handicapped and senior citizens who are not mobile.	The Authority agrees that an online application process will improve its service to applicants. In March 2020, the Authority went digital and now facilitates the electronic submission of new and renewal applications. Renewal approval letters are mailed and also sent electronically to licensees. However, due to the current requirement for an original licence to be signed by the applicant, he/she will need to visit TATT's offices to collect a new licence.
13	3.3	Licence Term and Licence Renewal	Mr Nigel Sookdeo (Pres. College San Fernando)	Same day renewals	In the past same day renewals was available.  Just like a drivers permit. If any discrepancy is found during the term said licence can be revoked. If someone has a running licence with TATT for a number of years and is in compliance all legal requirements in our opinion a 3 month wait period is not necessary.	The Authority's licence renewal process is currently under review, with the aim of improving its efficiency and effectiveness. The improved process should significantly reduce the time it takes to renew an amateur radio licence.  The three-month period stated in section 3.3 of the Framework refers to the period before the licence expires, within which the renewal application can be submitted. This is not the length of time required for the processing of a renewal application. On average, the Authority processes a renewal application within two weeks, as it involves due diligence activities and accounting procedures. However, the Authority is working on improving this

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					Renewals should not be treated as new applications. Commercial hardline restrictions should be relaxed to encourage this experimental hobby.	process, to reduce the time to five working days. For the future, the Authority will consider a same-day process.  The application to renew a licence only requires the completion of a renewal form, which can be done at the Authority's office or online. In addition, the verification checks undertaken in this process are much less extensive than for new applications.
14	3.3	Licence Term and Licence Renewal	Ravindranath Goswami (REACT Council)	Currently, the licence is comprised of a multipage contract document and supplemented by renewal letters. In the current format, it is not easily portable.	It is recommended that a credit card sized document be added as a convenient identification that an operator can easily use for portability and travel.	The Authority understands that, in the past, a wallet-sized international amateur radio permit (IARP) was issued to amateurs. The Authority will implement the IARP process following the approval of this revised Framework, and wallet-sized cards will be issued along with the IARP booklet.
15	3.3	Licence Term and Licence Renewal	Ravindranath Goswami (REACT Council)	The current three (3) year term is too short.	It is recommend that the Authority considers increasing the licence validity period to at least five (5) years or perhaps even ten (10) years if possible. The option to pay either up front or annually, should be retained.	The Authority agrees with the recommendation to increase the licence term. Section 3.3 of the Framework has been amended to provide for a term of 10 years.  The Authority confirms that the options to pay the licence fee for the full term either upfront or annually will be retained.
16	3.3	Licence Term and Licence Renewal	Ravindranath Goswami (REACT Council)	The framework states that a reciprocal licence issued to a visitor is non-renewable, short-term and issued up to a maximum of one (1) year.	REACT recommends that consideration is given to long-stay foreigners, such as in the case of persons with work permits who are expatriate, be considered for either a renewal after the initial one (1) year or multi-year, up to their expected stay.	The Authority agrees with the comment and recommendation to issue longer-term reciprocal licences to long-stay visitors. Section 3.3 of the Framework has been amended to provide for longer-term licences for returning visitors, which are also applicable to long-stay visitors. For their second

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						application for a reciprocal licence, a long-stay visitor will be eligible for a non-renewable licence that is valid for up to three years.
17	3.3	Licence Term and Licence Renewal	Ravindranath Goswami (REACT Council)	The current process for payment of licences can be improved.	REACT recommends the establishment of an on-line system for payment of licence fees.	The Authority agrees with the recommendation and is pleased to advise that, since April 2020, online payments are accepted for application and licence fees.
18*	3.3	Licence Term and Licence Renewal	Mr Jeffery Austin (TTARS)	It is ludicrous that one already has a licence and has to renew. This should only be the case if you lose your licence. To apply to renew is ridiculous.	The process should be automatic, based on the fact that the licensee holds a valid licence.	Based on section 39 (8) of the Act, a licensee is required to apply for a renewal of his/her licence. Therefore, at this time, the Authority is bound by law to require the submission of a renewal application before the renewal can be processed. It should be noted that the application for the renewal of a licence only requires the completion of a renewal form, which can be done at the Authority's office or online.
19*	3.3	Licence Term and Licence Renewal	Devanand Gosine (Naparima College)		TATT should consider making the licensing process more user friendly. In terms of frequency of payment, the time taken for payments to be processed and the time taken to process new licences. Also, licensees should be given the option to renew for five years and ten years.	The Authority agrees with your recommendations and is currently working on revising its licence application processes to make them more efficient and less onerous for applicants and licensees.  The Authority agrees with the suggestion for a longer licence term and section 3.3 of the Framework has been amended to provide for a licence term of 10 years.
20	3.4	Minimum age	Mr Nigel Sookdeo (Pres.	It is understood that the amateur radio license in Trinidad and Tobago is	Different countries have different age limits. The US has no minimum age requirement.	The Authority recognises the importance of youth involvement in the amateur community. Section 3.4 of the Framework has, therefore, been revised, as follows:

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			College San Fernando)	contractual and does not allow minors under the age of 18 to acquire. Presentation Collage San Fernando amateur radio club station is one of the oldest school club stations in the country. We educate persons in the art of radio communication. Aside from leaning a hobby many use this forum as a stepping stone to move onto different fields in wireless telecommunications. We have passed students who became engineers that worked for TTT, TSTT, Edgar Borde, Kenolds. To name a few. We also train persons in the discipline of emergency communication to be able to respond in the event of disasters. Most cases where minors pass exams by the time they reach 18 years they lose interest in the hobby.	Some countries the minimum age limit is 5 to 6 years. St Lucia minimum age is 12 .We would like to suggest the following (1) Special provision be made for radio clubs to allow minors who have passed accepted examinations to be able to operate under the supervision of licensed radio operator who's licence is more than 3 years old. For extended time period of 2 hours per session. (2) Messages/greetings: Our licence allow 5 minutes for non-licensed persons under supervision of licensed radio operator. We are asking for an extension of 15 minutes per session. We are requesting these time extensions so we can properly train minors and non licensed persons. These improvements will help keep our youths from being at a disadvantage to their foreign counter parts. And help us to keep the interest alive. Even if minors cannot get a licence, consideration for time extension maybe a good alternative. Alternatively the contractual structure of the licence can be changed to	“...There is no minimum age requirement for eligibility for an amateur operator/station licence. Once an individual obtains certification in accordance with section 3.7, he/she can be issued a licence by the Authority.”  Additionally, section 3.4 now includes: “...the Authority will issue amateur radio licences to a parent or legal guardian on behalf of the minor seeking to become a licensed amateur operator. The parent or legal guardian will be responsible for ensuring that the minor, when operating the amateur station, adheres to provisions of the Act, the licence and any other relevant regulations.”

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					accommodate licencing of persons under 18. This would allow Trinidad and Tobago to be on par with international standards.	
22*	3.4	Minimum Age	Mr Tommy Chen (IARU)	In some jurisdiction, like the UK, a parent or guardian can sign a licence on behalf of the dependent. When the minor becomes of legal age, they get full access of the call sign. In the meantime, the minor is supervised by the parent or guardian, to ensure they meet the requirements of the contract.		<p>The Authority recognises the importance of youth involvement in the amateur community. Section 3.4 of the Framework has, therefore, been revised, as follows: “...There is no minimum age requirement for eligibility for an amateur operator/station licence. Once an individual obtains certification in accordance with section 3.7, he/she can be issued a licence by the Authority.”</p> <p>Additionally, section 3.4 now includes: “...the Authority will issue amateur radio licences to a parent or legal guardian on behalf of the minor seeking to become a licensed amateur operator. The parent or legal guardian will be responsible for ensuring that the minor, when operating the amateur station, adheres to provisions of the Act, the licence and any other relevant regulations.”</p>
23*	3.4	Minimum Age	Devanand Gosine (Naparima College)	There is a thrust worldwide to encourage youth involvement in amateur radio services. In region one (1) there is a programme called Youth on the Air (YOTA) with competition	TATT should revisit the minimum age required to obtain an amateur licence. TATT should look at the legal framework in other jurisdiction that facilitate the licensing of persons under 18 years old.	The Authority recognises the importance of youth involvement in the amateur community. Section 3.4 of the Framework has, therefore, been revised, as follows: “...There is no minimum age requirement for eligibility for an amateur operator/station licence. Once an individual obtains certification in accordance with

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				activities to encourage young people. We should start thinking about the possibility of licensing persons under 18 years. There are kids in the US below 10 years old on the air. We are stifling our youth development, with this archaic rule.		section 3.7, he/she can be issued a licence by the Authority.”  Additionally, section 3.4 now includes: “...the Authority will issue amateur radio licences to a parent or legal guardian on behalf of the minor seeking to become a licensed amateur operator. The parent or legal guardian will be responsible for ensuring that the minor, when operating the amateur station, adheres to provisions of the Act, the licence and any other relevant regulations.”
24	3.5	IARP	Mr Nigel Sookdeo (Pres. College San Fernando)	We welcome IARP licence.	If possible IARP and a local licence can be done in the form of a credit card size similar to a drivers permit this would be convenient when mobile and travelling. I can provide a sample of one issued some years ago.	The Authority recognises the value of issuing such a card to amateur licensees. It is currently reviewing its licensing processes and will consider issuing wallet-sized cards to new and existing amateur licensees.  Regarding the wallet-sized IARP, this too will be considered, noting, however, that the IARP Convention stipulates that certain information is to be included on the permit, and it will not be possible to include all the required information on a wallet-sized card. Therefore, the wallet-sized IARP will be issued along with the IARP booklet.
25	3.5	International Amateur Radio Permit (IARP)	Ravindranath Goswami (REACT Council)	REACT appreciates the Authority specifying the acceptance of and issuance of IARPs.	Please clarify that an IARP's validity is one (1) year. Considerations should be made for the acceptance of CEPT.	In accordance with the IARP Convention, the IARP will be valid for up to one year from the permit issue date or up to the expiration date of the holder's licence, if the licence expires within one year.

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						The Authority has made recommendations for Trinidad and Tobago to become a party to the Amended IARP Convention, which provides for reciprocity with the European Conference of Postal and Telecommunications Administrations (CEPT) Member States.
26*	3.5	International Amateur Radio Permit	Devanand Gosine (Naparima College)	The issuance of IARPs to licensees is welcomed.		Thank you for your support.
27	3.6	Call signs and Identification of stations	Mr Nigel Sookdeo (Pres. College San Fernando)	Presently certain non amateur radio stations (9Y5) are allowed to operate within the amateur radio spectrum (2m) to facilitate emergency communication. Amateur radio licence booklet states under section Messages: A19 (d) Except with the written permission of the Authority, the licensee shall not call or transmit to any other station other than an Amateur Station.// Certain inevitable issues arise out of having both non amateur and	Amendment of regulations and or enforcement is advised for congruency in practice of this situation. (1) The present TATT regulations does	The draft NECP recognises the importance of amateur services in emergency communications and identifies the use of amateur stations as a secondary communications system to supplement the primary emergency communications systems. Consequently, the Authority accommodates such emergency relief agencies, by issuing the appropriate amateur radio licence for amateur stations to be used as a secondary emergency communications system. Additionally, the Framework has been amended to reflect that these amateur stations will now be issued 9Y5 call signs.  Regarding recommendations (1) and (2), there is no need to amend regulations or rules to accommodate emergency stations, since the operation of these stations must be in accordance with the rules of the Framework

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				amateur stations operate on the same frequency.	not permit amateur operators to speak with non amateur operators. (2) The permission for a non Amateur Station to operate within the Amateur freq band should be revised. (3) It is suggested whether or not non amateur stations are allowed to stay or vacate these frequencies, clear and precise guidelines can be drawn up as to the purpose, use and relationship between both parties on these frequencies.	and the conditions of the amateur licence.  Concerning recommendation (3), sections 3.1, 3.2 and 3.6 of the Framework have been amended to include the authorisation of emergency relief agencies requesting a licence to use amateur stations as a secondary emergency communications system.
28	3.6	Call signs and Identification of stations	Mr Nigel Sookdeo (Pres. College San Fernando)	Shortened call signs for foreign operators requesting to operate locally.	Most foreign radio ops coming to our shores usually come to participate in a contest or a DXpedition where the need to repeat your call sign is done hundreds sometimes thousands of times per a session. The two country prefixes separated by a / can be quite laborious lengthy and tiresome to repeat for any length of time. A shorten assigned version can be given e.g. 9Y8 or 9Z8 etc for visitors.	The Authority recognises the potential benefit of issuing shorter call signs with reciprocal licences to attract amateur visitors to Trinidad and Tobago. Section 3.6 of the Framework has, therefore, been revised to reflect this, as follows:  i. The suffix with the slash (/) character will now apply only to first-time visitors. ii. Returning visitors will be issued call signs with a prefix of 9Z9 or 9Y9 and the suffix will be shorter, i.e., excluding the slash character or the substantive call sign of the visitor.
29	3.6	Call signs and Identification of stations	Mr Nigel Sookdeo (Pres. College San Fernando)	Agreed licence class can be Basic and Advanced class. 9Z3 basic and advanced 9Z4 and 9Y4	For TATT to save administrative cost persons who wish to retain their 9Z4 call signs should be allowed to do so however new documentation stating 9Z4 is now Advanced should be printed on their	Amateurs with a 9Z4 call sign will be allowed to keep their call sign, as stated in section 3.6 of the Framework.  Your recommendation to print new documentation indicating that 9Z4 is now advanced class will be

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					licence especially when travelling to foreign countries.	implemented during the process of the automatic upgrade of licences from general to advanced class.
30	3.6	Call Signs and Identification of Stations	Ravindranath Goswami (REACT Council)	<p>Table 3 specifies the valid call sign prefixes for amateur stations that will operate in the amateur services. It is noted that the call sign prefix 9Y5 is not included in this list.</p> <p>Currently, there are stations with 9Y5 call signs that operate in the amateur bands (usually 2m). It is unclear whether the operators at these stations are always licenced amateurs or operating under the supervision of a licenced amateur.</p>	<p>REACT recommends that only licensed amateur operators (or persons operating under the direct supervision of a licensed amateur) be permitted to transmit in the amateur bands.</p> <p>It is recommended that all valid call signs be listed so that a licenced amateur is clear on what stations are permitted to operate. These call signs should also be listed in the call sign database published by the Authority.</p> <p>REACT is in support of critical infrastructure and emergency/disaster management organisations being assigned any call sign deemed fit by the Authority. REACT is also supportive of such</p>	<p>The Framework has been revised to include amateur stations being utilised as a secondary emergency communications system. Section 3.6 now includes the use of the 9Y5 prefix to be issued to such stations.</p> <p>The Authority agrees with the recommendation and confirms that any station transmitting in the amateur bands, including emergency stations, shall operate in accordance with the terms and conditions of the amateur licence. Therefore, these stations shall be operated by licensed amateur operators or under the direct supervision of a licensed amateur.</p> <p>The Authority agrees and shall publish on its website the call signs of all amateur stations used as a secondary emergency communications system.</p> <p>The Authority agrees with this recommendation and, as indicated above, these stations will be operated in accordance with the terms and conditions of the amateur licence. Therefore, these stations shall be operated by</p>

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					organisations having amateur radio equipment and stations as part of its business continuity programme. This helps in an emergency to have pre-positioned equipment and allows for an amateur that is either part of the organisation or from an emergency communications group to quickly become operational. However, REACT is of the view that under normal circumstances, only licenced amateur operators (or persons under the direct supervision of a licenced amateur) should be permitted to transmit on the amateur bands. It should not be the case that an unlicensed person can simply use the organisation's call sign to transmit. In the event of a life and death situation or declared national disaster, the emergency protocols would then apply.	licensed amateur operators or under the direct supervision of a licensed amateur.
31	3.6	Call Signs and Identification of Stations	Ravindranath Goswami (REACT Council)	Using slash (/) call signs for reciprocal operator/stations can be considered a burden and even a disincentive, especially for foreign amateurs who wish to contest or do a DX-pedition in Trinidad and Tobago.	REACT recommends the assignment of a shorter form call sign, without the use of the slash (/) prefix. e.g. 9Z9 Basic Reciprocal and 9Y9 Advanced reciprocal.	The Authority recognises the potential benefit of issuing shorter call signs with reciprocal licences to attract amateur visitors to Trinidad and Tobago. Section 3.6 of the Framework has, therefore, been revised to reflect this, as follows: <ul style="list-style-type: none"> <li>i. The suffix with the slash (/) character will now apply only to first-time visitors.</li> </ul>

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				This burden is exacerbated for CW operation where the larger number of characters can add to fatigue and even result in a lower number of contacts due to the tedium.		ii. Returning visitors will be issued call signs with a prefix of 9Z9 or 9Y9 and the suffix will be shorter, i.e., excluding the slash character or the substantive call sign of the visitor.
32	3.6	Call Signs and Identification of Stations	Ravindranath Goswami (REACT Council)	The framework makes provision for a vanity call sign suffix based on a request by the applicant and subject to availability.	It would be useful to indicate whether the Authority would consider call sign change requests after the initial assignment.  Additionally, it will be useful if the Authority can indicate in the framework how long after a call sign expires, that it can be released and made available for further assignment to another operator as a vanity call. REACT suggests a period of not less than two (2) years to incorporate a grace period within which the original licensee may renew and retain the call sign.	The Authority accommodates call sign change requests via the submission of a new licence application.  Unfortunately, the Authority cannot implement such a grace period. Once a licence is terminated or cancelled, the resources that were assigned with that licence become available for reassignment.
33	3.6	Call Signs and Identification of Stations	Ravindranath Goswami (REACT Council)	The issuance of 9Z6 call signs to special operation stations (repeaters) is noted.	REACT recommends that the option remains for the individual's or club station's substantive call sign to be issued for the repeater.  The 9Z6 call sign can be issued as an option to the requester as may be required	The current policy of a separate call sign prefix allocation for repeaters was adopted to allow for the unique identification of the repeater station. If the substantive call sign of the operator or club is used, that objective will not be achieved.

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					depending on the requirements of the mode. International linking on some of the digital networks can require either of the two options, and flexibility to choose will be appreciated.	
34	3.6	Call Signs and Identification of Stations	Ravindranath Goswami (REACT Council)	REACT welcomes the conversion of 9Z4 to 9Y4 call signs.	It is recommended that existing 9Z4 call sign holders be given the opportunity at their option to convert to 9Y4 without having to wait until their renewal cycle.	The Authority agrees with this recommendation, which will be implemented in the licence application process when the class of these licences is being upgraded from general to advanced.
35	3.6	Call Signs and Identification of Stations	Ravindranath Goswami (REACT Council)	Amateur operators are usually required to identify call signs periodically during transmissions mandatorily.	REACT recommends including a rule along the following lines. "Each amateur station, except a repeater station, shall be required to transmit its assigned call sign on its transmitting channel via the mode in use at the end of each communication, and at least every 10 minutes during a communication."	The Framework establishes rules for the authorisation of amateur radio services. Conditions applicable to the operation of amateur stations are in the licence document. Conditions A23 to A29 of the amateur licence state the rules for identification of a station, including that a licensee shall identify the station by the transmission of the call sign at the beginning and end of each communication and every 15 minutes during any given communication. This condition shall be retained.
36*	3.6	Call Signs and Identification of Stations	Mr Tommy Chen (IARU)	TTARS current implementation of repeaters are all operating with the call sign of the club. For TTARS's new D-Star repeater stack, which is configure with multiple frequencies, it is physically impossible to assign	The call signs of the clubs or amateur operators licensed to operate a repeater should also be the call signs issued to the repeater, even in cases where a club has multiple repeaters.	The current policy of a separate call sign prefix allocation for repeaters was adopted to allow for the unique identification of the repeater station. If the substantive call sign of the operator or club is used, that objective will not be achieved.  Additionally, a repeater station that has a D-Star repeater stack can use one repeater call sign when transmitting on the various frequencies.

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				individual call signs on the separate frequencies.		
37*	3.8	Emergency Communications	Noel E. Donawa (TTARS)	Amateurs monitor many bands, if an SOS message is received, they can act on the call to communicate with the party in distress and contact the relevant agencies to render assistance. Amateurs in some cases may be the only stations reachable to a party in an emergency.	The Framework should note that amateurs are allowed to monitor other bands, in event an SOS is received is allowed to initiate communications, log details for relay to relevant response agency.	Section 3.9 of the Framework has been updated to indicate that amateur operators can operate equipment with receiving capabilities in frequency bands not allocated to amateur radio services.  Amateur operators are authorised to transmit only in the frequency bands allocated to amateur radio services, in accordance with the ITU-R Radio Regulations. Notwithstanding this, on receiving a distress alert (SOS), an amateur operator should relay the message to the agency responsible, for example, the Trinidad and Tobago Coast Guard.
38	3.8	Emergency Communications	Ravindranath Goswami (REACT Council)	REACT is appreciative of the Authority's recognition in the framework of the role played by amateurs in disasters and the importance of having radio communications assets that are frequency agile.  REACT works closely with served agencies such as the ODPM, TEMA and the DMUs of the Municipal Corporations as well as first	It is recommended that the framework goes a step further to recognise that amateurs have the ability to transmit out of band in an emergency, for example, when an SOS is heard in the marine band. The framework should also recognise that amateurs have the ability to monitor a wide part of the spectrum in this regard.  REACT also recommends that a life or death situation such as the SOS alluded to above or similar emergency, be differentiated from a declared	Amateur operators are authorised to transmit only in the frequency bands allocated to amateur radio services, in accordance with the ITU-R Radio Regulations. Notwithstanding this, on receiving a distress alert (SOS), an amateur operator should relay the message to the agency responsible, such as the Trinidad and Tobago Coast Guard.  An SOS situation does fall within the definition of an emergency. The rules under section 3.8, particularly rule 31, are meant to encompass all emergencies, including an SOS.

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				responder agencies such as TTPS, TTFS, and TTDF.	disaster/emergency and recognise that amateurs play a crucial role in both situations.	
39	1.1 / 1.5	Rationale / Relevant Legislation	Ravindranath Goswami (REACT Council)	Both sections 1.1 and 1.5 quote similar content from the Telecommunications Act, but the formats are different, and one gives the relevant section, but the other does not.	Standardise the citation by listing in both sections, the section number from the Act. Utilise the same numbering either 1, 2 or i, ii, for consistency.	Sections 1.1 and 1.5 of the Framework have been amended to standardise the citations from the Act.
40*	3.1.1	Operator/Station Licence	Mr Jeffery Austin (TTARS)		To add to Mr Chen comment, in Barbados the locals are given 8P6 and a visitor is given 8P9. Similarly, in Grenada, a local is J39 and visitor J37. A numerical differential is used to differentiate between a call sign issued to a national and a local. A similar approach can be considered in Trinidad and Tobago.	The Authority recognises the potential benefit of issuing shorter call signs with reciprocal licences to attract amateur visitors to Trinidad and Tobago. Section 3.6 of the Framework has, therefore, been revised to reflect this, as follows: <ul style="list-style-type: none"> <li>i. The suffix with the slash (/) character will now apply only to first-time visitors.</li> <li>ii. Returning visitors will be issued call signs with a prefix of 9Z9 or 9Y9 and the suffix will be shorter, i.e., excluding the slash character or the substantive call sign of the visitor.</li> </ul>
41*	3.1.1	Operator/Station Licence	Mr Tommy Chen (IARU)	Other jurisdiction in the Caribbean, for example Barbados, have a separate category of licence for visitors who remain in the jurisdiction for an extended period of time. This makes	TATT should adopt the approach used in Barbados where a special call sign allocation is given to expats and extended stay visitors.	The Authority recognises the potential benefit of issuing shorter call signs with reciprocal licences to attract amateur visitors to Trinidad and Tobago. Section 3.6 of the Framework has, therefore, been revised to reflect this, as follows:

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				their destination attractive to foreign amateur operators. There are examples of expats that lived in Trinidad and Tobago from the UK and the US who applied for licences and were given a reciprocal licence, with prefix (9Y4 or 9Z4) followed by a stroke (/).		<ul style="list-style-type: none"> <li>i. The suffix with the slash (/) character will now apply only to first-time visitors.</li> <li>ii. Returning visitors will be issued call signs with a prefix of 9Z9 or 9Y9 and the suffix will be shorter, i.e., excluding the slash character or the substantive call sign of the visitor.</li> </ul>
42*	3.1.3	Club Station Licence	Dr Kim Mallalieu (UWI & UWI ARC)		We should relook at the categories to be more intuitive, for example use classifications of individual and organisation.	The Authority agrees with this recommendation. Sections 3.1, 3.2 and 3.6 of the Framework have, therefore, been amended to provide clear rules for the authorisation of a distinct category of an amateur station that will be used as a secondary emergency communications system.
43	3.1.3	Club Station Licence	Mr David Drakes (WASA)	<p>The Water &amp; Sewerage Authority was granted a Club Station Licence in February of 2019. The purpose for which this licence was requested is for emergency communications, as outlined in item 3.8.</p> <p>However as per item 3.1.3 – Club station licenses are issued to organizations</p>	<p>The activities of the Water &amp; Sewerage Authority are not expressly devoted to activities related to amateur radio services.</p> <p>We therefore recommend that Section 3, Item 3.1.3 be amended to be more inclusive of organizations which have adopted amateur radio communications – which will be utilized as a means of emergency communications.</p>	The Authority agrees with this recommendation. Sections 3.1, 3.2 and 3.6 of the Framework have, therefore, been amended to provide clear rules for the authorisation of a distinct category of an amateur station that will be used as a secondary emergency communications system.

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				whose primary purpose is devoted to activities related to the amateur radio services.		
44*	3.1.3	Club Station Licence	Mr Dennis Marcelle (ODPM)	There needs to be some distinction for agencies granted licences for emergency purposes. There may be issues going forward with those entities falling under club station licences.	Some distinction should be made for the emergency communications entities.  A separate classification can be considered for stations / agencies that currently utilise the 9Y5 call sign	The Authority agrees with this recommendation. Sections 3.1, 3.2 and 3.6 of the Framework have, therefore, been amended to provide clear rules for the authorisation of a distinct category of an amateur station that will be used as a secondary emergency communications system.
45	3.1.3	Club Station Licence	Ravindranath Goswami (REACT Council)	The framework specifies eligibility for club station license.  The framework requires an organisation to designate a trustee in order to obtain a club station license.	Organisations involved in critical infrastructure and emergency management should also be specified as being eligible. In an emergency or a disaster situation when radio networks are established, it helps that one call sign, such as Club call, is used to make it easier, simpler and more effective and efficient when multiple operators take turns or change shift.  It will be helpful if, from the Authority's perspective, the role and responsibilities of the trustee can be outlined within the framework.	The Authority agrees with this recommendation. Sections 3.1, 3.2 and 3.6 of the Framework have, therefore, been amended to provide clear rules for the authorisation of a distinct category of an amateur station that will be used as a secondary emergency communications system.  The Framework has been amended to include the roles and responsibilities of the trustee, in relation to the Authority, as follows:  "The trustee must be an individual who holds a valid advanced class local operator/station licence issued by

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				<p>It is also referenced in section 3.2 that the class of license issued to the club station will be determined by the class of license held by the trustee.</p>	<p>It should be stated in the framework, what happens if the initial trustee is no longer available and is replaced by another trustee with a different class of call sign. E.g. whether there will need to be a call sign change. REACT recommends in such a case that the original call sign continue in a grandfathered arrangement to the club.</p>	<p>the Authority and is responsible for ensuring the club station operates in accordance with the provisions of the Act, the licence and the other relevant regulations. The trustee will be the point of contact for the club on all matters related to the club station.”</p> <p>The Framework has been amended to reflect that clubs and emergency stations will only be granted advanced class licences, so trustees must hold an advanced class licence. The recommendation cannot, therefore, be implemented. Amateur clubs and disaster relief agencies must ensure that an advanced class amateur operator is available to replace the initial trustee if required.</p>
46*	3.1.3	Club Station Licence	Mr Tommy Chen (IARU)	<p>The spirit of amateur radio services is experimentation and fraternity amongst operators, and a club station licence fits into that vision and purpose. Allowing other organisations to get club licences, when their main purpose is to provide emergency services, leads to a situation where a level of commercialisation comes in. Specifically, ODPM and</p>		<p>The draft NECP recognises the importance of amateur services in emergency communications and identifies the use of amateur stations as a secondary communications system, to supplement the primary emergency communications systems. Consequently, the Authority is considering accommodating in its authorisation process such emergency relief agencies, by issuing the appropriate amateur radio licence for amateur stations to be used as a secondary emergency communications system.</p>

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				WASA. There is no issue with schools having club station licences.		In this context, the Authority agrees with your recommendation that emergency relief agencies should not be issued club station licences but a distinct category of licence for an amateur station that is used as a secondary emergency communications system. Sections 3.1, 3.2 and 3.6 of the Framework have been amended to provide clear rules for the authorisation of this category of amateur station.
47*	3.1.3	Club Station Licence	Devanand Gosine (Naparima College)	A key guideline for operations at Naparima and Presentation amateur club stations is that a licensed amateur operator must always be present, when the station is operated. Are we going to have a non-licensed operator operating the club station at emergency times and are we going to have enough licensed amateurs around to supervise these persons at the time of an emergency? We should be careful with the framework as it can allow the amateur radio band to be proliferated by entities claiming to provide emergency services,		<p>The draft NECP recognises the importance of amateur services in emergency communications and identifies the use of amateur stations as a secondary communications system, to supplement the primary emergency communications systems. Consequently, the Authority is considering accommodating in its authorisation process such emergency relief agencies, by issuing the appropriate amateur radio licence for amateur stations to be used as a secondary emergency communications system.</p> <p>In this context, the Authority agrees with your recommendation that emergency relief agencies should not be issued club station licences but a distinct category of licence for an amateur station that is used as a secondary emergency communications system. Sections 3.1, 3.2 and 3.6 of the Framework have been amended to provide clear rules for the authorisation of this category of amateur station. Importantly, these</p>

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				but their ambitions may exceed their capabilities.		stations are required to conform to the rules of the Framework and the conditions in the amateur licence. These include the rules on the definition of an amateur operator and supervised operation. The NECP also stipulates that these stations must be operated by a licensed amateur operator or under the direct supervision of a licensed operator.
48*	3.1.4	Special Operation Station Licence	Dr Kim Mallalieu (UWI & UWIRC)	Provisions should be made to licence beacon stations for modes other operations in a permanent fixed location. It will be useful to have the flexibility for nomadic beacons and mobile beacons, without the need endure a process of informing the Authority of the operation location, each time the beacon is moved for an experiment.	Not all beacons are fixed, nor do they always transmit regularly. Accommodations should be made for both fixed beacons and for ad hoc ones. Regular (existing) licences should cover operation of ad hoc mobile and nomadic beacons for short periods (few days or weeks or even months) to conduct various types of location-based measurements. Under such an arrangement the licensee can be required to inform the local Amateur radio community and TATT of its intention to operate the beacon, indicating the proposed frequency, call sign and period of operation. TATT should allow such operation for VHF radios at specified maximum ERP anywhere within Trinidad and Tobago land areas and its exclusive economic zone (EEZ). The home base of the	<p>The Authority recognises that the main concern is the administrative burden of applying for a licence every time the beacon changes location.</p> <p>Ad hoc beacons, like permanent beacons, require a special operation station licence because frequency coordination and the issuance of an appropriate call sign for station identification are required.</p> <p>Based on condition A32 of the amateur licence, both ad hoc and permanent beacons will have a Main Station Address recorded in the licence document. Additionally, these beacons are allowed to operate at temporary locations within the area of operation denoted in Schedule B of the licence document, for example, Trinidad and Tobago (including territorial waters). The licensee will, however, be required to notify the Authority of planned operations at temporary locations and of planned mobile operations. This approach is in alignment with the recommendation.</p>

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					<p>licenced radio, already on record, should suffice; and the licensee should not be confined to operate the radio in a fixed mode or locate it at a permanent location. Operation of ad hoc beacon functionality in this mode should not require a special licence.</p> <p>In addition TATT should publish on its website information on beacons that are in operation, including the frequencies used. This would supplement the direct notification to the community in an effort to ensure that all amateurs are aware that beacons are operating and expect to receive signals at the transmission frequencies anywhere in Trinidad and Tobago, including its marine environment.</p>	<p>Based on section 38 of the Act, licences authorise operations within territorial waters and not the EEZ. The proposed amendments to the Act, currently under consideration, extend the Authority's remit to the EEZ.</p> <p>The Authority agrees with this recommendation and will publish on its website the frequency assignment, location and call sign information of all licensed special operation stations.</p>
49	3.1.4	Special Operation Station Licence	Ravindranath Goswami (REACT Council)	REACT welcomes the establishment of frequency coordination mechanisms for special operation stations such as repeaters and beacons.	REACT recommends the establishment of a frequency coordination committee or council, chaired by the Authority, to include stakeholder representatives from the amateur radio clubs and other relevant parties.	The Authority is pleased that the amateur community is interested in participating in the frequency coordination process. This approach will be considered during the next review cycle of this Framework, in accordance with the Authority's consultation procedures, as the frequency coordination process has only recently been implemented.

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50	3.6.1	Special Event Call Signs	Ravindranath Goswami (REACT Council)	The framework restricts special event call signs to clubs only. Other jurisdictions within IARU Region 2 (US and Canada) allow for individuals to obtain a special event call sign to, among other things, participate in DX-peditions and other activities such as parks on the air, summit on the air, etc.	REACT requests the inclusion of individuals to be eligible for the issuance of special event call signs.	The Authority agrees with this recommendation. Section 3.6.1 of the Framework has been amended to include the eligibility of individuals who hold either basic or advanced class amateur licences to request special event call signs.
51	3.7.2	Recognised Certification	Ravindranath Goswami (REACT Council)	The framework referenced the following as approved certification bodies. i. City and Guilds of London Institute ii. Radio Society of Great Britain (RSGB) iii. Federal Communications Commission (FCC) Approved Volunteer Examiner Coordinators which include but are not limited to: - ARRL - Laurel Amateur Radio Club iv. Innovation, Science and	It is recommended that persons who have been military trained and certified as signallers, be considered for the issuance of the appropriate class of license.	The Authority will consider other qualifications on a case-by-case basis, by comparing the syllabus of any certification being presented with that of established amateur certifying bodies, to determine an appropriate class of licence that can be issued.  However, it should be noted that the Authority intends to establish local certification for citizens of Trinidad and Tobago. This will ensure that all new licensees will be subject to a standardised certification process, irrespective of previous expertise or training.

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				Economic Development Canada (formerly Industry Canada) inclusive of: - Accredited Examiners approved by Innovation, Science and Economic Development Canada (formerly Industry Canada) v. National Telecommunications Commission of Venezuela (CONATEL)		
52	3.7.2	Recognised Certification	Ravindranath Goswami (REACT Council)	The framework states that <i>“In some instances, examinations of foreign certification bodies are administered locally, under the auspices of amateur clubs.”</i>	It should be noted that in the case of the FCC/ARRL exams, it is the Volunteer Examiners (VEs) that conduct the exams and not under an amateur radio club. Also, such exams are currently scheduled as determined by the VEs.	The Authority agrees with this comment and recommendation. Section 3.7.2 of the Framework has been amended to reflect how the examinations are currently administered.
53*	3.7.2	Recognised Certification	Mr Jeffery Austin (TTARS)	The amateur clubs are not involved in administering the examinations. The volunteer examination coordinators affiliated with ARRL are responsible for administering the examinations		The Authority agrees with this comment. Section 3.7.2 of the Framework has been amended to reflect how the examinations are currently administered.

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54*	3.7.2	Recognised Certification	Devanand Gosine (Naparima College)	Historically the clubs were involved in administering the City & Guilds examination. They are no longer involved, the VECs are solely responsible.		The Authority agrees with this comment. Section 3.7.2 of the Framework has been amended to reflect how the examinations are currently administered.
55	3.7.3	Local Certification	Ravindranath Goswami (REACT Council)	The idea of a local examination is a good one. It should be noted that with the current FCC/ARRL VE arrangement, the cost to do exams is approximately TTD 100.00, which is economical. It would be optimal for any replacement/supplemental arrangement to be similarly cost-effective.	In the case of local approved tertiary education institution developing and administering amateur radio exams, it is suggested that amateur radio stakeholders play a role as part of a review board to determine the syllabus and learning objectives.  REACT recommends, notwithstanding, the pursuit of a local examination, that the currently accepted certification bodies continue to be accepted.	Your comments and recommendations on the cost and involvement of tertiary education institutions are noted and will be considered when a framework is being established for the local certification.  The Authority shall consider accepting certification from foreign bodies even after local certification has been established.
56*	3.7.3	Local Certification	Mr Tommy Chen (IARU)	Support the inclusion of this section. Hopefully in the future, one of the Universities will take up the challenge.		The Authority agrees with your comment.
57*	3.7.3	Local Certification	Devanand Gosine (Naparima College)		There should be definite/set dates for local examinations (ARRL), not the ad hoc way that exams are administered currently.	The Authority agrees with this recommendation. The Authority has a list of local volunteer examiners and will initiate discussions to gain a full understanding of their process and challenges, to determine how the

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						Authority can facilitate in resolving the scheduling issues.
58	3.9.1	Spectrum Allocations	Mr Nigel Sookdeo (Pres. College San Fernando)	For continued experimental purposes and investigation we kindly request for consideration a band plan allocation for 70Mhz 4 meter band.	Requested frequency range for the 70Mhz 4 meter band is (70.000 to 70.500Mhz) VHF 100 watts.	The 4m band is part of television channel 4. This channel is currently assigned to a free-to-air television broadcaster in Trinidad and Tobago, so amateurs cannot operate in this band.
59	3.9.1	Spectrum Allocations	Mr Nigel Sookdeo (Pres. College San Fernando)	Moon Bounce EME (earth moon earth) is a field practised by many amateurs around the world. Basically it deals with transmitting a signal to the moon which is then reflected off the surface of the moon and returns back to earth. We have operators here in Trinidad who practice same.	Mostly VHF and UHF frequencies are used.  Because of the distance travelled by the signal high power is used. We are requesting For EME use only a power increase of 1kilowatt per band. In countries like Australia special high power permits are issued for operating EME	As it stands, the power limits within the amateur operator/station licence are specified in terms of radio frequency (RF) output power (output of transmitter). Therefore, the required radiated power (output of antenna) for EME can be achieved based on your network design.
60	3.9.1	Spectrum Allocations	Ravindranath Goswami (REACT Council)	The schedule of frequency allocations being included in the licence document is noted.	REACT recommends the inclusion of both primary and secondary allocations within the licence document as far as practicable.  It is also recommended that the frequency allocations be included as an appendix to	All the primary allocations to amateur services are already identified in Schedule B of the licence document. The Authority will assess whether all secondary allocations can be included in the frequencies available to amateur operators in Trinidad and Tobago. If it can be, the schedules will be updated accordingly.  The Framework indicates that the allocations are identified in the <i>Trinidad and Tobago Frequency</i>

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					<p>the framework as well.</p> <p>REACT recommends for agility that the framework and licence document indicate that notwithstanding the publication of the schedule, amateur operators can immediately access any other spectrum allocated and ratified by the relevant bodies (WRC/ITU/TTFAT/IARU), without having to wait until license renewal.</p> <p>Special consideration is requested for operation on 2m and 70cm for EME (moon bounce) operations at a higher power than the stipulated 100 W.</p>	<p><i>Allocation Table</i> (TTFAT). The allocations are referenced and not replicated to avoid issues of misalignment between the information in the TTFAT and the Framework. The TTFAT is updated with every World Radio Conference (WRC) cycle, to ensure changes to regional frequency allocations are captured.</p> <p>Changes to the frequency ranges allocated to the amateur radio services will be reflected in a subsequent revision of the TTFAT. Once the TTFAT is updated, the Authority will issue an updated Schedule B of the licence document to active amateur licensees.</p> <p>As it stands, the power limits within the amateur operator/station licence are specified in terms of RF output power (output of transmitter). Therefore, the required radiated power (output of antenna) for EME can be achieved based on your network design.</p>
61*	3.9.2	Usage of Frequencies and Bands	Mr Tommy Chen (IARU)		After each WRC, spectrum allocations to amateur radio can change. The Schedule B that is part of the licence document should point to a dynamic document that is	The Authority recognises the value of having the technical schedule in the licence document reference a document that can be easily amended based on changes in frequency allocation and operation limits from ITU-RR or other updates. However, there are legal

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					updated when the allocations change as a result of WRC.	implications to this arrangement, so the frequency allocations shall remain in the licence document. If there are changes, licensees will be notified and issued revised schedules accordingly.
62*	3.9.2	Usage of Frequencies and Bands	Devanand Gosine (Naparima College)		The licence schedule can simply say, in adherence to the latest WRC and Trinidad and Tobago Frequency Allocation Table, to allow the living document to remain relevant despite the changes to allocations based on WRC decisions and TTFAT amendments.	The Authority recognises the value of having the technical schedule in the licence document reference a document that can be easily amended based on changes in frequency allocation and operation limits from ITU-RR or other updates. However, there are legal implications to this arrangement, so the frequency allocations shall remain in the licence document. If there are changes, licensees will be notified and issued revised schedules accordingly.
63	3.9.3	Frequency Assignment in special operations station	Mr Nigel Sookdeo (Pres. College San Fernando)	Repeaters and Beacons	Each Club station can have a limit on the number of repeaters and beacons allowed to have, because of limited frequencies. Provisions should be made to allow for fair and even distribution among other clubs. Persons should be reminded Amateur Radio repeaters and beacons are for the use of all licensed Amateur operators as the frequencies they operate on are not private frequencies.	There are sufficient frequencies to facilitate amateur repeaters and beacons in Trinidad and Tobago. There is, therefore, no need to limit the number of frequencies for repeaters and beacons assigned to an amateur club.  All beacon and repeater licensees are informed that the frequencies they are assigned are not private. The frequency coordination conducted by the Authority is to ensure orderly use of the beacon and repeater frequencies and do not represent an exclusive assignment.