

**Answers Regarding 96<sup>th</sup> Meeting, Web-Meeting, 8-12 June 2020, Doc. FM(20)103**

**Date issued:** 15 September 2020

**Source:** Germany

**Subject:** Romanian Questionnaire concerning the issuance of amateurs' certificates and licences in electronic format Doc. FM(20)103 issued 9 June 2020 – Response from Germany

The German opinion regarding this subject is expressed in the following:

1. Does your Administration take into consideration the issuance of the amateurs' certificates and licences in electronic format? If yes, please provide further information.

☒ Yes      ☐ No

Details:

In addition to the advantages already mentioned by the Romanian administration with regard to the portability of electronic documents on a wide variety of terminal devices and the containment of the coronavirus pandemic, the Federal Network Agency is obliged by national legal regulations to offer its administrative services in the long term fully by electronic means.

The physical documents currently in use are not suitable to reach this goal. Therefore, the Federal Network Agency is interested in the issuing of all amateur radio certificates and licences with CEPT equivalence in electronic form.

This applies equally to the relevant documents of the CEPT Recommendations T/R 61-01 and ECC Recommendation (05)06 as well as to the examination certificates according to the CEPT Recommendation T/R61-02 and the ERC Report 32.

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2. Does your Administration agree with such an electronic format, and even if you do not intend to use it, will your Administration recognize such documents issued by other CEPT Administrations? If yes, please provide further information.

☒ Yes      ☐ No

Details:

Electronic amateur radio certificates and licences issued by other administrations in an electronic format, which is adequately protected by technical means against forgery should most widely be accepted also by the German administration. The validation should be possible at any time, if possible without technical background knowledge and with little expenditure of time, and it should be based on common and internationally recognized methods.

For this purpose a qualified electronic signature or a corresponding electronic seal could be used in accordance with Regulation (EU) No.910/2014 on electronic identification and trust services for electronic transactions in the internal market and to repeal the Directive 1999/93/EC, short eIDAS regulation. From our point of view, a qualified electronic seal that shows the issuing institution would be preferable.

In addition, it must be possible to check amateur radio licences according to CEPT Rec T/R 61-01 or ECC Rec (05)06 on site, i.e. at the location of the fixed or mobile amateur radio station. If no internet access is available at the operating site, the check should be carried out offline and only with simple widely used technical aids. This could be mobile devices such as smartphones, tablets or similar.

On the other hand, amateur radio certificates according to CEPT Recommendation T/R 61-02 or the ERC Report 32 must remain valid for a lifetime. However, the systems currently used for qualified electronic signatures and seals cannot ensure the preservation of the validity of the documents for such a long period. If qualified electronic signatures or seals shall be used, possible solutions must be developed.

3. In your opinion, what is the file format that is more suited for issuing these documents in electronic format? Furthermore, what document security method do you consider is more appropriate? Please provide a short description of the advantages offered by them.

☒ Yes      ☐ No

Details:

The Federal Network Agency supports the Romanian administration's proposal to issue the documents in PDF format.

In order to make administration more efficient and easier in its work processes, files are increasingly being created in electronic form rather than in physical form, or existing physical files are being converted to digital form. The integrity of the electronic documents is at the same time one of the most important security goals. (The integrity of a document ensures that there were no subsequent changes to the document.)

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For the long-term archiving of PDF documents, the ISO standard PDF/A is generally accepted, which guarantees the integrity of the document. In addition, PDF/A documents require comparatively little storage space and can be browsed automatically. PDF/A-3a represents the most detailed variant of the available substandards for PDF/A documents. It contains additional information to support people with special needs (accessibility) and is therefore suitable, for example, for speech synthesis using computers. The technical and organizational effort involved in creating PDF/A-3a compliant documents must be examined and is probably relatively large.

4. In your opinion, could it be useful to include a QR code in the electronic format? If you deem such a code a good idea, please suggest alternative barcodes that could be included.

☒ Yes      ☐ No

Details:

QR codes are a way of making document content accessible for machine processing and are therefore desirable from the point of view of the German administration.

In particular, the personal data according to

- Annex 1 No. 3b to 3d of the CEPT Recommendation T/R 61-02 and to
  - No. 3.3 letter b, d and e of the ERC Report 32 and to
  - Annex 1 No. 1 bullet points three to six of the CEPT Recommendation T/R 61-01 and to
  - Annex 1 No. 1 iii, iv, v and vi of the ECC Recommendation (05)06
- should accordingly be included in the QR codes of the amateur radio examination certificates and in that of the amateur radio licences.

In order to be able to define the size of the QR code, the individual data fields must be limited regarding their maximum length. Furthermore, the following additional content appears to be useful:

- A globally unique number that identifies the administrative act
- In the case of the CEPT amateur radio licences, a possibly existing expiry date of the licence.

The mapping of the document content in a one-dimensional and thus severely in its capacity limited barcode is not recommended from our point of view.

5. Does your Administration support this initiative at CEPT level, for the migration to digitally signed documents to be accomplished in a timely and effective manner?

☒ Yes      ☐ No

Details:

Based on the above considerations, the initiative of the Romanian administration is supported by Germany. Since the documents to be revised do not have legal effect only in the CEPT member states, it is suggested that also the participating non-CEPT administrations will be informed and asked for their statement regarding this issue.

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