

**Title:**

Mr

**Forename:**

Edmund

**Surname:**

Ashworth

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**What additional details do you want to keep confidential?:**

No

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

Having discussed the consultation with a large number of amateur radio licence holders it has become apparent that the overwhelming majority do share my own concerns with some aspects of this proposal. I feel that many have not been made aware of the consultation until very late in the process, and would hope that in future a much longer time scale would be allowed for response and maybe future proposals could be sent directly by email for consideration of those concerned.

**Question 1:Do you agree with the proposal to include, as a matter of course, the 470 kHz and 5 MHz bands into the Licence for all Amateur Radio (Full) licensees?:**

No - Both bands should be made available to all Full Licence holders but in an identical way to other bands to which amateurs already have access on a Secondary basis. The same wording that applies to other amateur bands is more than adequate.

Paragraph 2.26.3 should not include the words "electronic equipment" as this has never previously been included in the schedule and is at variance with Ofcom's normal practice in not investigating interference to non-radio related equipment.

Paragraph 2.26.6 should be completely deleted as this would be irrelevant at the power levels proposed. Clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not need to be reinforced in relation to the 472kHz band. Further to this if the aforementioned clause was adopted for other Amateur Radio Bands in the future it would possibly give the general public, who may not have a good understanding of radio, an unfounded reason to object to perfectly safe Amateur radio stations in close proximity to their homes which could effectively wipe out Amateur Radio if a precedent was set in relation to planning regulations as a result.

**Question 2: Do you agree that expressly linking a Full (Club) Licensee's authorisation to use the spectrum to his or her representation of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**

Yes a great addition to the regulations that is long overdue.

**Question 3: Do you agree that Ofcom should include a further ground of revocation in the Licence as proposed above in order better to align Clause 4 with the definition of 'Disqualified Person'?:**

Yes. A perfectly reasonable addition.

**Question 4: Do you agree that the word 'automatically' should be removed from Clause 4(5) of the Licence, in relation to the revocation of the Licence for failure to comply with the revalidation requirements?:**

Yes

**Question 5: Do you agree that Clause 15 of the Licence should be updated to reflect the wording included in Ofcom's General Licence Conditions Booklet?:**

No I disagree. Clause 15 does not need to be updated if no plans to introduce licence fees exist.

**Question 6: Do you agree that Clause 13 of the Licence should be amended to allow for a simpler, more flexible approach for identifying Amateur Radio stations?:**

No. I cannot agree with this as proposed. The current maximum interval of 15-minutes should be retained as it is more than adequate and is easily understood. I would suggest that specific terms such as voice or Morse Code should not be used in the wording as proposed.

**Question 7: Given the current uncertainty amongst Radio Amateur licensees in relation to Clause 2(2), do you believe that it would be a practical solution for Ofcom to remove this Clause and to insert additional wording into Clause 13, as proposed above?:**

No. There is absolutely no need to change the currently accepted method of identifying Amateur Radio stations. This is a "solution" to a problem nobody has and would in fact add confusion where currently none exists.

**Question 8: Do you agree with Ofcom's proposal to amend Clause 2(3) of the Licence to require Intermediate licensees to transmit a call sign that reflects the location of their main station?:**

No I do not agree with this proposal - All licence classes should be treated equally and retain the current clause in respect of the call sign prefix regulations.

**Question 9: Do you agree that replacing Clauses 2(1) and 16(1) with a new Clause to simplify and bring together all of the licence conditions relating to the operation of radio equipment away from the Main Station address will make these provisions clearer?:**

Yes

**Question 10: Do you agree that the proposed changes will clarify RAYNET operation under the Licence?:**

Yes