

**Title:**

Mr

**Forename:**

Martin

**Surname:**

Atherton

**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:**

This supplements my earlier response and addresses only the latest announcement about secondary locators for Cornwall. How on earth was this agreed in principle without mentioning it in the consultation??

NO NO and a 1000 times NO. This is absurd. Please stick to the current system as it is understood worldwide and coded into software worldwide. Secondary locators for constituent parts of the UK and Crown Possessions are fine and should be mandatory as we have always assumed them to be for decades. The minor exception of Z for Shetland in limited competition circumstances is also well understood. But a single county is nonsense. There have been no native Cornish speakers for a century (even if that were relevant).

AGAIN No No No No to K for Cornwall. You are all in danger of losing the plot.

**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 - not exactly as proposed. The bands should be made available on the same basis as other similar bands. The words "electronic equipment" should be deleted from 2.26.3 as this sets a highly dangerous and undesirable precedent. Electronic equipment needs to be designed with proper immunity. Para 2.26.6 should also be deleted as irrelevant at amateur power levels.

**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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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

**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

**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 comment

**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?:**

Not as proposed. The current 15 minute rule seems sensible while "as frequently as practicable" could be interpreted in a number of very different ways.

**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 no uncertainty amongst amateurs around the world. There is no need to change current custom and practice that is well understood internationally and is embedded in software apps, web sites and documents around the world. Any change would cause massive costs, and confusion lasting for a decade or more. Operators **MUST** use the appropriate secondary locator for the country they are currently in regardless of their home station location. No changes are needed other than to ensure that any ambiguous documents issued by Ofcom in recent years are tidied up

Ofcom claim that a station could have many different identities in a short period of time if a station is mobile - but this is an exaggeration of a rare and infrequent situation. A tiny handful of people, mobile, near a border may cross it from time to time but it is hardly burdensome for them to use the correct RSL so we should not make rules tailored to a rare situation that is in itself not a problem anyway - especially if the proposed new rule **WILL** cause massive problems for the majority.

**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 - all licence classes must be treated in the same way by retaining the current custom and practice in respect of callsign prefix. All classes of licence must use an RSL that reflects the place they are currently located.

**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?:**

I believe that Ofcom should not seek to exclude Club callsigns from CEPT use. When club members go on a group visit overseas it makes sense for them to use a single club call rather than all their individual ones.

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

No comment