

Title:

Mr

Forename:

Ian

Surname:

Barracclough

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

Keep organisation confidential

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:

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?:

I do not believe that the proposal in its current form is correct. Whilst I have no issue with these bands being issued to full licensees, they should be treated in the same way as other bands with a secondary user basis, i.e. on the basis of non interference with other services. The inclusion of the amateur station causing interference to "electronic equipment" is of great concern as the manufacturing standards of consumer electronics are cost driven, as opposed to standards driven, and a large percentage of modern consumer electronics is produced with inadequate screening. The inclusion of this wording pushes the onus of responsibility onto the licensee and grants exemption to the manufacturers of poor quality equipment - the current

license provision is more than adequate - this proposal sets a dangerous precedent. The HPA guidelines (referred to in 2.26.6) are regularly exceeded by a large number of handheld transmitting devices, without the users having any knowledge. The inclusion of this paragraph gives individuals with very little technical knowledge a cause for concern which does not exist. Determining the actual RF radiation field strength is difficult in the extreme, with wide ranging measurement accuracies.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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, this appears to be a sensible change to prevent future issues.

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':

This seems a broadly sensible move, which will have minimal effect on the vast majority of users

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?:

I believe that "Automatic" revocation should be just that. If a user has not revalidated their license, after a warning letter has been sent, the revocation process should be automatic, not as long winded as is laid out in the consultation document. This process will more accurately reflect that actual number of active licensed amateurs. It appears to me that the wording of the license is being changed to suit a bureaucratic process, rather than removing the bureaucracy associated with a comparatively simple task.

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?:

Agreed

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 can see no benefit for any user from this change, in fact, quite the opposite. The current stipulations are quite lenient enough, we should be encouraging stations to identify MORE frequently, not less so.

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?:

Absolutely No! The current system is simple and simply adopted. I cannot see how this can cause confusion except in extremis, and then only occasionally. The current regional secondary locators should remain.

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?:

Again, this appears to be trying to change the regulations for an oversight in administration procedures. Once again, the regional secondary locator should be applied to all license classes equally

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?:

Agreed

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

Agreed