

**Title:**

Mr

**Forename:**

Donald

**Surname:**

Beattie

**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:**

**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?:**

Yes - this seems an entirely sensible approach. However, Clause 2.26.3 seems to be at variance with the principles of the EMC Directive in respect of the right for authorised spectrum users to have a degree of protection from unwanted interference from electronic equipment. I would propose that the words "or electronic equipment" be deleted in view of these clashes with other regulations as it seems questionable whether it is possible to waive this right in regulations such as are proposed..

**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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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 has been a significant issue for many clubs. This is a step forward.

**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?:**

Yes

**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?:**

Yes

**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. This is moving in entirely the wrong direction as far as the amateur radio population is concerned. The use of an RSL plays an important part in the identification of the geographic country from which the station is transmitting. Making its use optional will cause significant disruption to global arrangements that have been in place for decades. The more appropriate approach would be to require the use of the RSL, reflecting the country from which the station is actually transmitting. This is pretty much the status quo in UK amateur radio circles, and the proposal in the consultative document seems to take no account of the very significant repercussions of disturbing it. The present arrangement is not in need of change, other than to remove any doubt and to emphasise the requirement universally to use the RSL.

I can see no reason for change, other than one arising from a misunderstanding of how the radio amateur movement operates.

**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. This seems to lack logic and consistency. The principal should be retained that the RSL indicates the country from which the transmission is taking place. There is no need to carve out a special case for Intermediate Licensees. The principle set out in A7 above should extend to intermediate licensees, ie Prefix = Country from which the station is transmitting. This is simple, capable of being understood by all, and aligns with principles that have governed the international recognition of UK amateur stations for decades. Again, I can see no reason for change, other than one arising from a misunderstanding of how the radio amateur movement operates.

**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?:**

No opinion