

Title:

Mr

Forename:

Patrick

Surname:

Gillen

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:

As a former member of FCS PMR Council and a director of a mobile radio dealership (now retired) I can say with confidence that the radiocommunications industry has benefitted greatly by having within its community a large number of radio amateurs. Particularly in the technical areas, many of the technicians and engineers employed in the industry have been innovators of new technology and techniques many of which have been honed by amateur radio practice. I believe that the facilities offered to radio amateurs should wherever possible be extended so as to offer the maximum encouragement to those wishing to practice the hobby whether as recreation or education.

There can be few activities practiced at their own expense by enthusiasts that have made such valuable contribution to a now dominant modern industry.

The RSGB in their various representations to yourselves have consistently promoted the interests of radio amateurs in a wholly responsible and intelligent manner and I would urge

that their views are taken fully into account in this consultation. I beg to add that I am not currently a member of RSGB.

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?:

Not as proposed. I agree that the bands should be made available to all Full Licencees but in exactly the same way as other bands to which amateurs have access on a Secondary basis. The standard wording applicable to other amateur bands should suffice i.e:

Secondary. Available on the basis of non-interference to other services inside and outside the UK

Furthermore some of the proposed clauses set concerning precedents that if subsequently applied to other bands would radically change specific aspects of amateur radio in the UK. 2.26.6, should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3

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?:

I support RSGB position

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??:

I support RSGB position

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 support RSGB position.

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?:

I support RSGB position.

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. A clear definition of callsign usage and the current maximum interval of 15-minutes should be retained. However the requirements that a station must be clearly identifiable at all times and that the identity be given in a format consistent with the modulation in use may be unnecessarily restrictive over time and should allow for flexibility in light of possible new technologies.

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 widely accepted and international practice in these matters and changes should not be implemented without a full understanding. The phrase "if it ain't broke don't fix it!" comes to mind.

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, as in Q7. If it ain't broke don't fix it!

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?:

No comment.

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

No comment