

**Title:**

Mr

**Forename:**

Dave

**Surname:**

Gilligan

**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. If it saves Ofcom time and money this can only benefit all parties concerned.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**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

**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. Unequivocally.

**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?:**

As long as the regulatory framework is prescribed in unambiguous terms I am in broad agreement with this proposal. That said I am not sure that the phrase "Radio Amateurs are best placed to decide how to go about identifying their stations" is sufficiently rigorous. The regulations should clearly state ~how~ an Amateur Radio station identifies itself. 'When', is a different matter.

**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?:**

Emphatically No! Furthermore, I do not understand how there can be so much uncertainty on this subject amongst Radio Amateur licensees; unless, of course, the inculcation of newcomers is not properly addressed within the current training structure?

Moreover, I am not convinced that personal choice is an elementary factor in drafting an unambiguous regulatory structure.

I feel strongly about this proposal and I am keen for Ofcom to understand the, perhaps unintended, consequences in the Amateur Radio fraternity. This is not about identifiability - that is a given as a reduced callsign is unique - but one of operational practicality.

I am a member of a V/U/S HF contest group in SE England. Our equipment uses highly directed aerial structures - multiple yagi-style or dish antennas. When I am called by a "GM" I ~know~ I should turn my beam to the North. Should I be called by a "GW", I turn my beam to the West. GI, GD, GU, GJ all denote a physical location of the station. Regional Secondary Locators are important in Amateur Radio. And it is an international more, despite the lack of

CEPT regulation Other countries use the numeric part of a callsign to denote locality or "Call Area". An EA6 is located in the Baleric islands; an EA8 the Canaries. The Call Area/RSL concept is widely recognised within the amateur fraternity worldwide and often forms part of the requirements for awards or the gaining of additional bonus points in contests. Should Ofcom insist that all of the UK is one Call Area there will be hundreds, if not thousands of disappointed Radio Amateurs, worldwide.

I believe that Regional Secondary Locators should be compulsory - as necessitated in the Intermediate licence callsign rules. This change, at a stroke, would resolve any `uncertainty` to the benefit of all.

**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?:**

Absolutely not! An amateur Radio station should transmit a callsign that denotes and reflects its physical location.

Should an Intermediate Licensee with a main station address in England decide to operate /Portable in Scotland or Wales then the appropriate regional Secondary Locator should be used - just like full licencees do- and, of course vice versa.

**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 am surprised to find that the Intermediate licence is issued in a non-compliant manner. It has been my impression that the callsign's second letter was mandatory and would be varied - as I would vary my G (England) call should I venture in to another Call Area.

In my opinion all licencees should transmit a valid callsign that denotes their physical location.

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

It has been my impression that RAYNET are `a law unto themselves` anyhow.

Agreed, they do useful work. They should be allowed, while attached to a User Service during an incident or while undergoing simulation training under the auspices of a User Service, to utilise their skill-set and equipment to the best effect and outcome.