

Title:

Mr

Forename:

J. P.

Surname:

Gilliver

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?:

I can see no reason why not, and it would reduce the administrative burden on both OfCom and individuals who wish to use the bands.

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circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

The provisions seem sensible, if somewhat obscure. It still seems needlessly tied to a single individual; ideally, a club call sign (and thus licence) should be issued to the club, not an individual, with obviously adequate provision that the club must include at least one full licence-holder, and perhaps a requirement on the club to keep OfCom informed of the current chairman/president/whatever, or (if he is not a full licence-holder) his nominated full licence holder.

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'?:

The wording in the proposal makes it rather hard to tell whether this applies to individual licences, club licences (albeit that those are currently held by an individual - but see my response to Q2 above), or both. Where the proposed addition relates to individual licencees, I have no strong view, although I think any such revocation should have a time limit on it. Where club licences are concerned, I think the proposal - as far as I understand it - carries the risk of a club losing its licence because of the actions of an individual, which I feel should not occur. (I may well have misunderstood the proposal in this respect.)

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?:

Most definitely. I am pleased to read that OfCom in practice make attempts to contact a licensee who is in danger of revocation; I feel this should become formally part of the process, rather than just practice, lest any future (especially driven by cost-cutting pressures) policy changes what is current practice. [Naturally, revocation in the event of a licensee being uncontactable should still be possible, though delivery of the revocation may be difficult - do Gazette notices still occur?!? They could be published via the RSGB and similar bodies, in the QTHR and online, so at least other amateurs could know not to establish contact.]

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 have no opinion, other than that any change should not make it any easier for OfCom to impose charges where none currently exist, or to increase those that do.

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?:

Some variation to the identification requirement would probably not go amiss, though the wording "a valid call sign for the station be transmitted as frequently as is practicable during

transmissions to ensure that the station is clearly identified" is a bit vague and contradictory - "as frequently as is practicable" could be interpreted as once a minute or less for speech, and many times a second for some modes! Contradictory by including "to ensure ... identified" in the same sentence. Perhaps "necessary" rather than "practicable" - yes, I think that would make the intent of the sentence clear.

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?:

I was/am as confused as anyone, so clarification certainly wouldn't be a bad thing! Among other matters, I'm not sure which of the terms used ("suffix", "RSL", etc.) apply to suffixes (like "/P" on the end, which IIRR means "alternative location" though many speak it as "portable", "/M" [mobile], and "/MM" [maritime mobile, i. e. on a water-borne vessel]), and which apply to variation of the prefix (such that G9XYZ would identify as GM9XYZ if temporarily in Scotland). I would submit that, for interference control purposes, the `_prefix_` requirement is useful, in that it identifies where a station actually is when transmitting (the possibility of a mobile station changing identity frequently in a short time I don't see as a problem - I don't see it happening that often!); how useful the `_suffixes_` are, I'm less sure about, though I have no `_objection_` to their use (and guidance leading to consistency, as suggested, can only be useful).

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. I believe that the call sign used should reflect the location of the station when actually transmitting, not the main station - this should aid in interference matters. As far as I can see there should be no ambiguity/duplication - unless, that is, the malfunction which resulted in some licences being issued with country identifiers already in, also resulted in the same base identity having been issued to two separate stations (e. g. if 2E0ABC and 2J0ABC have both been issued). Unless this has happened, then the callsign indicating actual transmitter location would, I feel, serve a useful purpose.

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?:

Reading clauses 2.81 to 2.88 of the proposal - relating to reciprocal etc. licences - made my brain hurt!

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I'm a `_bit_` puzzled as to why a holder of a foreign licence should wish to use a British reciprocal licence to operate in yet a third country, rather than obtaining a reciprocal licence directly from that third country's authorities: I have some concern that an apparently "British" licence might be used to get round restrictions, or otherwise evade limitations and similar matters. If this is not what is being discussed here, ignore me!

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The other simplifications (more or less clauses 2.89 to 2.92), as far as I can understand them, do sound sensible.

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

They sound eminently sensible. I can't think of any negative consequences at the moment; certainly the removal of anxiety from amateurs helping in such circumstances (that they might be breaching licence conditions) is a good move.

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Some clarification of "Encryption" may be in order: if, for example, the use of codewords (for individuals etc.) is requested, that could make sense in some circumstances. Machine encryption, e. g. of computer data, might be more problematic.