

Title:

Dr

Forename:

John

Surname:

Gould

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:

This is a personal response, though as RSGB President there is understandably close similarity with the response submitted by the Society.

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?:

The 470 kHz band should be included in the licence as like most other amateur bands included in the licence it has been authorised through a NoV. However the special clauses included in the NoV were really a carry-over from the Special Research Permit NoV and are not appropriate to an ITU RR band allocation to the amateur service. The standard wording "Secondary. Available on the basis of non-interference to other services inside and outside

the UK" should suffice.

In particular Para 2.26.3 should be omitted as the non-interference to Wireless Telegraphy by the standard phrase above and the referencing electronic equipment has implications that are not in accord with the EMC Directive and its Rehearsals.

Another clause that should be omitted is 2.26.6. Radiation hazards are not a primary issue within the WT Act and have not be brought out in more than a guidance note in the licence previously. I would strongly urge that the existing Clause (e) in Notes to Schedule1 of the existing licence is sufficient (with the reference to HPA updated) and does not need to be reinforced in relation to the 472 kHz entry. Clause 2.26.6 was probably carried forward from the 501 kHz Special Research Permit NoV, where the primary interest was RFI. Modelling or measurement of near-field energy at these frequencies is very difficult to determine with any accuracy. The typical E-field strengths near to a vertical aerial for 5W of transmit power are of the order of 20V/m, which is well within ICNIRP levels without even considering duty-cycle.

The 5 MHz segments could be integrated into the licence since they will either be carried forward under ITU RR Article 4.4 arrangements or an amateur allocation at 5 MHz may be formalised at WRC15. If the latter it is possible that some changes may be agreed for UK implementation that will make a further NoV necessary. It is difficult to see which the best course of action is - integrate now with a possibility that a NoV will need to be issued or continue with authorisation via NoV until the next update of the Licence.

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?:

Agreed

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??:

Agreed

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?:

Agreed

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, providing that the fee-charging regime does not change significantly.

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. The current maximum interval of 15 minutes should be retained. It has worked well, leads to little confusion and helps maintain clarity of the identity of the station transmitting. Making a change will create a fresh confusion since it is acknowledged that the proposed relaxation will not apply to 5MHz segments.

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. I strongly oppose a change to the current mandated and widely accepted practice. I don't agree that significant confusion exists, and where it does it stems from Ofcom's lack of consistency in the way it issued some licences.

The current arrangements whereby the second prefix letter (as the amateur community refer to the nationality identifier part of the ITU RR call sign structure) normally defines a region of the UK. The practice of changing this as one moves regions has been trained and practiced by generations of UK amateurs and is recognised worldwide. Indeed, identification of the UK region is an integral part of many amateur operating awards and contests around the world. Making this option will inevitably tempt some to challenge convention and as a result mislead others in terms of their location. It will make some operation at VHF and above more difficult as beam heading cannot anymore be guaranteed from call sign prefix.

The premise for the change seems flawed. Ofcom have not demonstrated sufficient reason for the change and in terms of Impact has ignored the strong adverse reaction to the proposal last year in our own consultation. Maintaining the status quo in itself would continue to meet the requirements of Clause 19.68 of the ITU RR as it doesn't specifically exclude a second letter to be used alongside G or M as the nationality identifier. Our call sign series has been around for many decades and wasn't seen to be an issue at WRC03 when clause 19.68 was adopted (our current licence was revised three years after WRC03).

I would support the RSGB proposal to keep Clause 2(2) with the following additional wording underlined:

"The Licensee shall use the following appropriate Regional Secondary Locator after the United Kingdom Callsign prefix "G", "M" or "2" as specified in Section 1, modifying any regional identifier incorporated in the callsign or as changed by a variation to the Licence, when identifying the Radio Equipment in accordance with Clause 13(1):"

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 disagree - this change is superfluous if the correct decision is taken on Q7 above

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 - and furthermore Ofcom should go further and address other editorial issues:

- Deletion of Clause 17(1)(kk) on 'Tidal Water', which is redundant
- Clarification around 17(1)(d) and 11(1) so that communications can more clearly be with any licensed amateur, rather than just UK ones
- Making a clearer distinction between Remote Control and Unattended Operation in Section-10
- I would support discussion of how specific Aeronautical Mobile operation

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

Agreed