

Title:

Mr

Forename:

Michael

Surname:

Granatt

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, but only with these qualifications:

- access should be granted on the same basis as other secondary access amateur allocations, i.e. "Available the basis of non-interference to other services inside and outside the UK."

Specifically, in paragraph 2.26.3, the words

"electronic

equipment" should be lost because they would set a very unwelcome and unexplained precedent for the whole amateur licence and for which no

justification is offered. Paragraph 2.26.6 prescribes near field measurements which are not easily made accurately, and seem disproportionate given the power levels involved. Clause (e) in the notes to Sch 1 of the licence seems to do the job already.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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, but NOT as suggested.

The proposal would introduce ambiguity and confusion. The very simplest requirement is close to current practice

1. The callsign should be transmitted in the format and modulation being used for the message content.
2. The callsign should be used at the beginning of a contact and at least every 15 minutes thereafter. A change of frequency is deemed as a new contact.

That would be unambiguous and simple.

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 - it would just cause further confusion, given years of current practice.

It would be better to make the RSL indicate only on the main station address. That would be unambiguous, memorable, and recognise the status of nations within the UK. (There is no case for making the callsign dependent purely on transmitter location within the UK.

Amateurs routinely give their location in the early exchanges.)

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?:

Yes. For the reason given in answer 7 above, and to make the system consistent across the licences.

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?:

Yes. Speaking as as a Raynet county controller, it would also be useful if the clarifications articulated in the document were included in Notes on the licence.