

Iain Grant

**Q1.** I agree that the 470 kHz and 5 MHz bands should be made available to all UK Full Licensees (including Clubs). ***For consistency of administration, both these bands should be on the same basis as the standard operating practices of existing amateur bands under the current UK Licence Clause 5(1) (b)*** which states effectively that use of Radio Equipment must not cause or contribute to Undue Interference to the authorised use of other radio equipment. The standard wording applicable to other amateur bands should also suffice i.e. ***“Secondary. Available on the basis of non-interference to other services inside and outside the UK”***.

The above is most pertinent in view of the potential allocation of both the 470 kHz and 5 MHz bands being allocated to the Amateur Radio Service at the next World Radio Conference (WRC), notwithstanding that Ofcom would seek prior agreement of the MOD before making any further spectrum available in the 5 MHz band should WRC allocate this additional spectrum to the Amateur Radio Service.

**Q2.** Yes, I agree. Club Licences should be protected.

**Q3.** Yes, I agree.

**Q4.** Yes, I agree.

**Q5.** Yes, I agree

**Q6. Not as proposed.** Ref 2.59, items a) to e), (Transmission of call sign). These current requirements should be **retained**. These requirements work flawlessly in practice and the 15 minute maximum period is ideal. To replace the 15 minute maximum with the term ‘as frequently as practicable’ leaves that interpretation open to abuse.

**Q7. Not as proposed.** Clause 2(2) of the current UK Licence Regulations is quite clear and unambiguous in that the use of UK RSLs is **mandatory** – “The Licensee **shall** use the following appropriate Regional Secondary Locator after the United Kingdom call sign prefix “G”, “M” or “2” as specified in Section 1....”

UK RSLs have been in common use for several decades to indicate the location of a UK transmitting station. It has been the practice, and it is understood by both UK and International Amateur Stations, that the UK RSLs U, D, J, I, M, W signify that the station is **transmitting from that respective UK Locator (other than England), irrespective of the station’s Main Address/Locator**. My opinion is **ALL** UK stations should be issued with a call sign **without any RSL whatsoever**, with the appropriate RSL subsequently included by the

**operator IF DESIRED.** UK RSLs do work well in many circumstances. However, use should be **optional**.

### **Call Sign Suffix.**

**Note (c) in Notes to the licence (UK Licence Regulations) provides that:**

“(c) If the Radio Equipment is used solely by a Club then the following Regional Secondary Locators **may** be used instead of those described in Clause 2(2): X, P, T, H, N, S, C”.

It is often the practice that the UK RSL suffixes of X, P, T, H, N, S, C are used by Club Stations to signify that the station is **transmitting from that respective UK Locator, irrespective of the station's Main Address/Locator**. My opinion is **ALL UK Club Stations should be issued with a call sign without any RSL whatsoever, with the appropriate RSL subsequently included by the operator IF DESIRED**. Club UK RSLs do work well in many circumstances. However, use should remain **optional**.

**Note (d) to the Licence provides that:**

When operating at locations other than the Main Station Address, it is recommended that the following suffixes be used: A, P, M, MM. As currently, use should **remain optional**.

**Q8. The Intermediate 20 and 21 call signs are a mess.** These call signs should be treated the same way as Full and Foundation Licences with respect to UK RSLs.

As far as I can determine, Articles 19.68 and 19.50 of the Radio Regulations are a mess. As I interpret both these articles, existing G0, G1, M0 and M1 call signs **do not conform to these Articles** (the Articles state that the digits 0 and 1 **shall not be used**), and certainly 20 and 21 allocations would still not comply with these Articles even if an RSL **was** included, since either the digit 0 or 1 is currently included in that call sign series.

**Q9. Yes, I agree.**

**Q10. Yes, I agree.**