

**Title:**

Dr

**Forename:**

Ralph

**Surname:**

Harkness

**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?:**

No, this should also be available to Intermediate Licences as full licence holders are not necessarily better operators than intermediate licence holders.

This can be divisive and unhelpful within clubs and with friends.

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**circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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

However, more needs to be done by Ofcom to disqualify licence holders for inappropriate use of and bad language with radio frequencies on the designated bands.

**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?:**

No. People who fail to comply with regulations deserve to lose their licence. There should be an automatic disqualification, as with driving licences, for failure to comply with the rules and regulations.

**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. But this needs to be properly regulated and 'policed' by Ofcom

**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. However, stations who fail to properly and correctly identify themselves should be liable to disqualification of their licence.

**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?:**

The wording of the Radio Licence should be clear, concise and understandable and written in plain English in order that any and all uncertainty is removed.

**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. This should be amended in order that all levels of licence holder are obliged under their licence to adhere to the same rules and regulations.

**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. As with my answer to question 8 above.

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

Yes.