

Title:

Mr

Forename:

John Davidson

Surname:

Harris

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 agree that these bands should be open to all full licencees but on the same basis as the other bands. The proposed clauses appear to be unnecessary and some in particular for the amateur give rise to concern.

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circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

No. The existing regulations concerning call sign usage and frequency of identification should remain. However I would support the requirement that a station should be easily identifiable at all times and that identity should be given in the modulation in use.

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. The present practice has been followed since the early days of amateur radio and changing it would cause much more confusion. There is no need for change.

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. All classes of licence should be treated in the same way and call signs should surely reflect the location of the transmitter rather than the location of the main station. The suggested change would cause confusion and appears to be quite unnecessary.

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, so long as the suggested changes do not incorporate material alterations to the regulations.

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

No comment