

**Title:**

Mr

**Forename:**

Stephen

**Surname:**

Hartley

**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

**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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**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 new wording is more onerous; 'practicable' means 'possible' so stations would be required to identify on every occasion it is physically possible to do so. That would be unworkable. Following the health and safety world and using 'reasonably practicable' brings in a measure of proportionality and judgement, which is what I believe is closer to the intent.

**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, in 30 years of being licensed I have never seen any evidence of ambiguity over RSLs. The current Licence says 'shall use' which is as unambiguous a statement as one can get. This all seems to have stemmed from an Ofcom change of policy whereby RSLs used to be shown on the Licence, based on the main station address (I had GM0FUW on my licence when I lived in Scotland) and the holder was required to change the RSL depending on location. This seems entirely sensible in terms of identifying the rough location of any source of interference. Ofcom do not appear to have assessed the impact on the world-wide amateur radio community where the RSLs are used for awards and contest multipliers. Any national change would have international impacts. The complications the change would introduce for Intermediate Licence holders is also unwelcome. This is a very unwise proposal on many fronts.

**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. Such a change would make it harder for Ofcom to trace interference and cause major problems across the international amateur radio community. The system has worked as it is for nearly 25 years and there is nothing in the consultation document to make a case for change.

**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