

Title:

Mr

Forename:

Peter

Surname:

Herbert

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?:

Question 1 response

No.

The consolidation of the two bands (470khz and 5mhz) into the full license is ok. The issue is with the statement on intrerference.

Interference of any nature should be reported to and dealt with by OFCOM. Leaving or ignoring any interference from any source will eventually lead a total breakdown of the ability to use that frequency or band by any user. Therefore the phrase :- "shall not cause

interference to electronic equipment" and "may not claim protection from, other wireless telegraphy or electronic equipment" should be removed as all interference from any source should not be allowed. To add this phrase in the general license is setting a precedent. Proposal is leave these as NOV's with any special requirements attached to these bands only. Please note :-

DIRECTIVE 2004/108/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 15 December 2004

Acting in accordance with the procedure referred to in Article 251 of the Treaty (2),

Whereas:

(2) Member States are responsible for ensuring that radiocommunications, including radio broadcast reception and the amateur radio service operating in accordance with International Telecommunication Union (ITU) radio regulations, electrical supply networks and telecommunications networks, as well as equipment connected thereto, are protected against electromagnetic disturbance

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

Question 2 response

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':

Question 3 response

Yes

No point in having this if detection and prosecution rates don't increase. Nothing brings the law into disrepute than having regulations made that are then ignored by the authorities

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?:

Question 4 response

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?:

Question 5 Response

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?:

Question 6 response

No.

Keep it at 15 minutes.

The proposed change still says we have to ensure we keep identifying ourselves, but doesn't state a time. This will just make things more confusing, not less.

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?:

Question 7 response

No

I don't believe there's any significant uncertainty among radio amateurs regarding the use of RSNs at present, and I am certain that Ofcom's proposal will introduce a great deal of uncertainty that isn't there at present. I don't doubt the present wording could be clarified, but the suggested change is pretty much exactly not what's needed.

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?:

Question 8 response

No

This is a good reason to keep clause 2(2) pretty much as-is. Having the RSI optional for everybody other than intermediate stations is confusing enough.

Forcing intermediates to use their main station RSI whilst everybody else continues (as surely they will) to use the RSI appropriate to the current location will be completely hopeless.

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?:

Question 9 response

No

Leave as is other than below.

The Aeronautical prohibition should be removed from the licence. Currently Licence Exempt users are permitted to operate low power Aeronautical Mobile. If people without a licence are permitted to do that then it follows that all classes of Amateur licence should be allowed the same.

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

Question 10 response

No

The situation of a user service handing a Raynet group a previously encrypted message for transmission has been known and accepted for a long time.

To me this clarifies it. The transmission callsign is identified, but the amateur has not encrypted the transmission.