

Title:

Mr

Forename:

David

Surname:

Hobro

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. Not as proposed, I agree that the bands should be made available to all Full Licencees but in exactly the same way as other bands to which amateurs have access on a Secondary basis. The standard wording applicable to other amateur bands should suffice i.e:

"Secondary. Available on the basis of non-interference to other services inside and outside the UK"

Furthermore some of the proposed clauses set concerning precedents that if subsequently applied to other bands would radically change specific aspects of amateur radio in the UK. Of particular concern is Paragraph 2.26.6, which should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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. This proposal will ensure that the 'Club Callsign' will remain with the club in the event the individual no longer represents the club in question.

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. There may be circumstances where a licensee may not be able to re-validate. The existing practice is both fair and 'robust'

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. Not as proposed in the review. A clear definition of callsign usage and the current maximum interval of 15-minutes should be retained. However the requirements that a station must be clearly identifiable at all times and that the identity be given in a format consistent with the modulation in use are supported. The inference that a specific method of identification be used may be inappropriate.

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 - there is no need to change what is current and widely accepted practice. Any change of current practice will lead to both confusion and disruption both nationally and internationally. The removal of the secondary locator may hinder the resolution of problems should cases of interference occur.

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?:

As with Question 7 above the use of the Regional Secondary Locator clarifies the location of the station. The comments in Q7 are just as relevant to this question. The Regional Secondary Locator defines the administrative location the station is located in. IARU has defined each of the administrative sub-divisions within the UK, the removal of the Regional Secondary Locator would be contrary to this definition.

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?:

No. The emphasis in this instance needs to be clarifying the conditions rather than defining them in one place. Once this has been done then there should be no problem centralising the location of the conditions in the license. The interpretation of "Maritime Mobile" has always been based on the UK Territorial Waters.

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

Yes.