

Title:

Mr

Forename:

Tony

Surname:

Hosking

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

Keep part of the response confidential

If you want part of your response kept confidential, which parts?:

Additional comments

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

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. If these bands are made available to all Full Licencees it should be 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 is appropriate i.e:

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

Some of the proposed clauses would create unfortunate precedents; if they were subsequently

applied to other bands they 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

Paragraph 2.26.6, requires near-field measurements that at LF are notoriously inaccurate and in fact irrelevant at the power levels in use. Clause (e) in Notes to Schedule 1 of the existing licence already applies - no further reinforcement is needed in relation to the 472kHz entry.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

I have no strong views, but would observe that the existing arrangements appear to work in most cases.

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 - in principle. There must however be a mechanism for a disqualified person to re-apply and be fairly considered once any penalty has been discharged.

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, this would seem to be a sensible change.

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?:

I have no strong views.

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?:

Not as proposed. A clear definition of call sign transmission with the current maximum interval of 15-minutes should be retained to assist monitoring, other amateur stations and short-wave listeners.

The requirement 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. But specific terms such as voice or Morse Code should be omitted.

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 - I do not believe uncertainty exists. There is no need to change current mandated and widely accepted practice. The proposed changes will lead to both confusion and disruption both nationally and internationally.

Moreover, the proposed changes would abandon more than 50 years accumulated practice, widely understood throughout the world and would create far more confusion than is currently alleged to exist.

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 I disagree - the proposal would be discriminatory to Intermediate licensees, All call sign classes should be treated in the same way by retaining the current clause in respect of the call sign prefix.

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?:

I have no strong views.

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

I have no strong views.