

**Title:**

Mr

**Forename:**

Raymond

**Surname:**

Howells

**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 do not agree as proposed.

I do agree that the bands should be made available to all Full Licencees but in the same way as other bands to which amateurs have access on a Secondary basis. I suggest that the standard wording applicable to other amateur bands should suffice as follows:

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

Furthermore some of the proposed clauses would set precedents that are of great concern if subsequently applied to other bands. They would radically change specific aspects of amateur radio operation 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

Clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not need to be reinforced 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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**

Yes - an excellent idea

**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 - providing there is enforcement resources made available.

**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?:**

I agree

**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 agree

**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?:**

Do not agree.

Let's 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?:**

Do not agree.

I believe there is no need to change the currently used and widely accepted practice. Any change of current practice will lead to both confusion and disruption both nationally and internationally. The OFCOM proposal would do away with more than 50 years of practice, which is widely understood throughout the world.

Why try and change it as the OFCOM proposal 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 do not agree.

The suggested change would cause great confusion. The present format works just fine.

**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 agree

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

I agree