

**Title:**

Dr

**Forename:**

Des

**Surname:**

Howlett

**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:**

I was first licensed in 1985 aged 15 and took over my uncle's previous B licence callsign.

I am a previous Chairman of Reading and District Amateur Radio Club, but make these comments as a private individual and not on behalf of the club in any way.

Eur Ing Dr Des Howlett CEng MIET Senior MIEEE G8FIF

**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, with the proviso that no other parts of the licence changes (i.e. all other bands, modes and allocations are kept as-is).

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**

The principle is sound, the method apparently less so.

The procedure should be that officers of the club - assuming that they can prove that they are successors of the licensee - should be able to apply for the licence to be transferred to them. The current holder should be contacted before such a transfer takes place.

I would want safeguards in the following situations:

- Potential revocation simply because Ofcom believes that a person is no longer associated with a club (or is an officer of a club)
- The danger that a club splits in two and a rival faction sets out to have the club's calls revoked

We have experience of losing (and regaining) a call in my own local club. It was held by a previous chairman who left and we lost touch with him. Once it had apparently lapsed the then chairman reapplied, proved who he was and we now have it back. We have since drawn up documents which holders sign to authorise transfer in the event that they leave the club and are uncontactable.

**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?:**

"Automatically" should be removed and replaced with text to the effect of "after all reasonable attempts at contacting the licensee have been exhausted".

**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?:**

Less proscriptive yes, but there should be a requirement that any station should identify itself to any other on request.

This would allow a station to identify themselves, then ask who are the other parties using the frequency.

**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.

The clause needs to be clarified to state that the RSL is used based on the CURRENT location of the transmitting station. Using an RSL to indicate the main station location is pointless since it does not help to locate the transmitter. If RSLs are to be removed, you may as well fix all callsigns in one format: G9QQQ, M9QQQ and 2G9QQQ and outlaw anything else completely.

My original licence, issued in 1985, includes the following clause:

"9(a) at an address other than the main address the Licensee shall, in order to indicate the country or place of use, vary the prefix letter to the callsign by using prefix letter(s) appropriate to that country or place, being G for England, GM for Scotland..."

Statement 2.69 of the consultation document that "...our view, if used an RSL should describe the location of the main station address..." runs counter to the terms of the licence and established practice. I have used GM8... in Scotland, GI8... in Northern Ireland etc. You are proposing a very fundamental change to Amateur Radio in this country and are now issuing guidance that directly contradicts our previous legal obligations.

The statement in 2.69 that "a station could have many different identities in a short period of time" is, with only two exceptions, completely false. The only places where a station could have two identities (within the G/M/2 area) are moving along the England/Scotland and England/Wales border areas. Aeronautical mobile operation is forbidden so no other use case needs to be considered.

I have operated as EI/G8... then GI8... on crossing the border from the Republic of Ireland to the North (this would still exist, though you propose dropping GI in favour of G only).

Knowing that a transmitting station is located in Scotland for example is of use when using directional antennas. If GM9QQQ is on holiday in Jersey, then signing as GJ9QQQ would help me turn a beam in the correct direction. What is the point of knowing that they normally live in Edinburgh in this particular case?

If I go to any other country under the CEPT rules I use their prefix to enable other people to identify my location, why not within the United Kingdom & Crown Dependencies?

As an alternative, I propose reintroducing the wording of the earlier licence to make it absolutely clear that prefixes are to be used "appropriate to the country or place" where the station is currently located.

**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. They should identify themselves, as I have stated in response to Question 7, where they are currently located.

**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 end of clause 2(f) should be amended from "...in accordance with Clause 16(1)" to "...subject to any further restrictions in Clause 16(1)".

Clause 16(1) then changes to "Where this Licence is a Full Licence or Full (Reciprocal) Licence, but not...".

The confusion surrounding club calls will then disappear because they would come under the modification to clause 2(f).

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

I agree with allowing communication with non-licensees for User Service purposes.

I disagree with the use of encryption, especially since you have not made it clear under what circumstances it might be necessary, or how it might be achieved. There is a huge difference between not being explicit in speech (ie "have you located the item of interest?" rather than "have you found the body?") and using some kind of encrypted audio like that which might be used by the police or other emergency service.

Also, I object to the explicit provisions with regard to RAYNET. Whilst they are a very valuable organisation, they are not "special" in the licence and we are all bound by the same terms and rights with respect to any User Service.