

Mr

**Forename:**

Tim

**Surname:**

Hugill

**Representing:**

Self

**Organisation (if applicable):**

Licence G4FJK

**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 have held an Amateur Radio Licence since 1973 and am currently active in a number of aspects and roles in transmitting and receiving on the "Amateur Bands".

In all discussions that I have heard and read regarding this Consultation, I have found that my personal opinion is totally aligned with that of the RSGB. My responses below for Questions 1, 7 & 8 therefore follow that of the RSGB in most aspects.

**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 - I DO NOT AGREE WITH THIS PROPOSAL

I agree that the bands should be made available to all Full Licensees 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"

The proposed text of conditions for operating as a Secondary User are far too complex to ensure that they can be implemented on a day-to-day basis.

**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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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 is a sensible approach, very relevant to a possible problem in our local community.

**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

**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?:**

- no opinion -

**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 - I DO NOT AGREE WITH THIS PROPOSAL

A reasonable amount of discipline needs to be retained and encouraged, in the area of Identification, and through the use of regular transmission of the station's callsign.

Part of the slightly quaint Self-Training aspect of Amateur Radio should be the clear

identification of a station. Without these simple standards being retained, standards of discipline are almost certain to fall.

**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 AGREE WITH THIS PROPOSAL

Whilst this proposal will seem sensible from an administrative perspective, from an operational perspective, both within the UK and outside the UK, it would cause significant disruption to a procedure which, with training for new licensees, is perfectly satisfactory.

With that in mind, I agree with the RSGB's view that there is no need to change current mandated and widely accepted practice.

Any change of current practice will lead to both confusion and disruption both nationally and internationally.

Additionally it is important that the region of transmission should be retained in any definition and use of a RSL.

To do otherwise would do away with more than 50 years of 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 DO NOT AGREE WITH THIS PROPOSAL

I agree with the RSGB's view that all call sign classes should be treated in the same way with the appropriate RSL being used to indicate the location of the transmission by the station.

**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?:**

Yes

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

Yes