

Title:

Mr

Forename:

Michael

Surname:

Isherwood

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"

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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 I agree , as a Club licence holder I appreciate the need for a Club to be able to retain a call sign if the original member is no longer available to be custodian.

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 a mechanism needs to be established for revocation of the licence and defining the Phrase Disqualified may be helpful.

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 I agree with automatically being removed , as when licence numbers have eventually settled down it would be beneficial to provide a period of grace for licensee's to revalidate. Not unlike the American FCC system which gives a period of 2 Years before revocation takes place.

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.

Identification is needed on a regular basis this extends to automatic devices such as repeaters digital transmission be it TV or data. here exists an opportunity to align speech automated transmissions and data modes including cw with a consistent identification constant be it at least 15 minutes or sooner should contact allow.

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 current mandated and widely accepted practice. Any change of current practice will lead to both confusion and disruption both nationally and internationally. 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 disagree this is an opportunity to align the anomaly of the intermediate call with the rest of the Call sign allocations.

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 I think we have had the opportunity to use equipment away from the main address for long enough to know the importance and usefulness of identifying your location no further clarification or relaxation is needed.

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

Interesting that Ofcom should wish to include an exception to the no codes or cypher rule. However I know Raynet would welcome this amendment so if it legal to go down this path then yes. I do think it could cause a problem with things like DMR with people encrypting talk groups and using the RAYNET exception as an excuse.