

Title:

Dr

Forename:

Doug

Surname:

Fenna

Representing:

Organisation

Organisation (if applicable):

Isle of Wight Raynet

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?:

Yes, but it should on the same basis as the other bands as far as possible. The need for protection from radiated fields is already covered, and the need to comply with other countries’ laws is universal. The additional requirement to avoid interference to electronic equipment has not been explained or justified, and this could have far reaching consequences.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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?:

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?:

"As frequently as is practicable" is open to wide interpretation. The existing 15 minute rule is easily understood and should be retained.

Also the freedom to transmit the callsign in any format "consistent with the modulation in use" could make it very difficult to read a station's callsign, in view of the variety of digital modes now in use.

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 proposed wording is still unclear, and the existing practice in the UK Amateur community of using an RSL appropriate to transmitter location should be retained. Anyone with the knowledge to identify a licensee from their callsign will know that the RSL is not significant.

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. The proposed wording is still unclear, and the existing practice in the UK Amateur community of using an RSL appropriate to transmitter location should be retained. Anyone with the knowledge to identify a licensee from their callsign will know that the RSL is not significant.

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, we very much welcome these proposals.