

Title:

Mr

Forename:

Jonathan William

Surname:

Jarvis

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 - but the issue is with what is proposed. I do agree that the 470kHz and 5MHz bands should be included in the Full Licence but on a non-interference Secondary basis.

I have real issue with the statement, "The station must not cause interference to, and may not claim protection from other wireless telegraphy or electronic equipment." I am particularly concerned with the inclusion of 'electronic equipment' in the wording.

I have worked as a professional EMC consultant for many years. There are far too many pieces of electronic equipment in circulation that have poor immunity to RF transmissions.

They do not meet the requirements of the European EMC Directive or FCC part 15. It should be the responsibility of a Radio Amateur to ensure his transmissions are within band but he or she cannot be held responsible for the poor RF immunity of electronic equipment. Both Paragraph 2.26.6 and the wording 'electronic equipment' in 2.26.3 should be deleted.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

This seems fair enough. So yes.

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?:

NO,

Perhaps I'm an old traditionalist but,

I have found that there are a minority of Amateur Radio operators that do not transmit their Callsign often enough. This can be very annoying when you want to call them. The licence should not be changed to allow a more flexible approach to identifying radio amateur stations.

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 can't see the point in changing the licence to alter the way things currently happen.

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 really can't see why any change to the current practice is required.

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