

Title:

Mr

Forename:

Brian

Surname:

Jones

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:

Callsign G0UKB

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?:

In principle I agree but there are specific points to which I disagree. The proposal to introduce all of the caveats of the NoV into the general licence are unnecessary and inconsistent - for example #2.26.6 is applicable to all bands and is already working practice.

#2.26.3 is worrisome as it leaves open the clause that ANY electronic equipment (by design or fault) is allowed to radiate RF and there is no remit to seek a remedy.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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 - a sensible measure to save both Ofcom and stakeholders time and effort

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 - agree

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 - automatic revocation was always bad wording.

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?:

In parts - however I would elect to keep the 15 minute minimum period of identification. The remaining changes are fibne.

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?:

My initial response to this is No! One of the important aspects of amateur radio as a hobby is the concept of separate countries (DXCC entities) and, the UK comprises of several separate DXCC entities (England, Wales, Scotland, NI, Isle Of Man, Jersey, Guernsey) and each is uniquely identified through the existing RSL system.

However I note today that the Ofcom has agreed to issuing an RSL (K for Cornwall) that

does not map to a separate DXCC entity . As a stakeholder I object to this MOST STRONGLY! Some aspects of the hobby rely upon the rarity of the licence callsign and allocating the RSL to Cornwall has tilted the playing field in their favour. Does Ofcom propose to issue L as an RSL for the Duchy of Lancaster, V for the Isle of Wight, GWA for Anglesey?

If Ofcom is minded to allow RSLs on a whim then I would change my vote to Yes but with the MANDATORY usage of the DXCC modifier so that a English license holder transmitting from Wales say must sign GW/english-call.

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 rules should be consistent. Either retain RSLs as an indicator of DXCC entity (and stop issuing vanity RSLs such as K) or treat intermediate licensees in the same way as others and mandate the DXCC prefix so 2E0ABC transmitting from Wales should identify as 2W/2E0ABC

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