

**Title:**

Mr

**Forename:**

Geoffrey

**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:**

For reference my callsign is M0GUF.

**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?:**

While agreeing in principle with the addition of the two bands, I have some specific concerns. It makes good sense to remove the need for a Licence Variation by incorporating the bands into the Licence but the Licence places absolutely specific requirements on radio amateurs regarding producing interference out of band or by deviation from the transmitted

frequency, or by exceeding power levels permitted. these apply to primary and Secondary usage. Paras 2.26.3-2.26.6 are redundant, merely restating the standard Licence requirements and these paras. should be removed. This applies also to 2.27.5.

Measuring transmitted power at 470kHz is problematic and Radio Amateurs would be expected to err on the side of caution regarding radiated power levels - and in any case be properly familiar with the effects of RF on human health.

2.26.3 is of particular concern as it adds the class of all 'electronic devices' from which no immunity may be claimed, thereby removing the basis to challenge the manufacture or use of equipment which emits RF out of band, or on this band specifically. I cannot accept that ofcom wishes to provide carte blanche to manufacturers to produce equipment which is free to produce interference in any band and remove any right to challenge the radiation of RF which does not comply with the fundamental requirements of the WT Act. 2.26.3 is redundant as mentioned above, and in its present phrasing is at the very least ambiguous and at worst opens the door to unchallenged and illegal activity. 2.26.3 should be removed in its entirety.

**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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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. An eminently sensible 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. A conviction for non-compliance should entail forfeiture of the Licence.

**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. It is essential that a Licence-holder's details remain up-to-date at all times. However, holders of a Full Licence appear also to hold Foundation and Intermediate Licences as well, the current system apparently being unable to automatically revoke a Licence at a lower-level once a higher-level Licence is obtained as the higher-level Licence supercedes it. Any opportunity to rationalise this process should be taken to reduce the logistics of tracking renewals of Licences that have no purpose. Perhaps automatic revocation of lower-level Licences is a more fundamental priority and would significantly reduce Ofcom costs?

**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?:**

A station must be clearly identifiable at all times. There is no definition offered as to what is reasonably practicable. 'All' actually means that every transmission must include the call sign as that is the only way that 'all' could be satisfied. While aiming to simplify what has been effective guidance resulting in good practice is removed with this form of words.

Retain the original wording as in Clause 13. It is specific, sets a minimum, entrenched in good practice and easily understood. Fixing things that aren't broken usually results in unforeseen and unintended consequences and they are usually negative ones.

**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?:**

There is no uncertainty amongst the Radio Amateur Community. The system is perfectly clear. "The Licensee shall use the following appropriate Regional Secondary Locator after the United Kingdom Callsign..."

The only confusion that has been created in recent years is as a result of the ill-thought through and inconsistently-applied system for Intermediate Licences using the 2E0 prefix. Using a letter where the RSL has to be placed ("shall use", not "might use" or "may choose to use") was a silly mistake. Footnote 42 accepts that the format of the Intermediate Licences does not conform to 'Art 19 of the RRs' but does not mention that this is the result of poor Ofcom planning regarding the issue of Licence numbers - and the solution is to modify the entire system to correct a mistake, ditching RSLs in the process.

Ofcom does not need RSLs to identify a station and certainly the base call sign could change frequently - however, the addition of a single letter after the first letter is not rocket science and not beyond the wit of the average person to understand. The granularity aids the radio amateur community and does nothing to reduce the ability to identify a station in any way, but does enhance the ease of location.

Clarify the rule to ensure consistency so that users are mandated to use the RSL. Simple, easy, effective, retains all advantages and has no disadvantages.

Get rid of the 2E0 prefix for Intermediate.

**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. This has to be taken in conjunction with Q7.

Ofcom should not have issued Licences with a country identifier already inserted into the call sign/ Having done so, rather than rectify the mistake by dealing with the problem of 8,000 possible problem call signs - which, having made the mistake it should put right - it plans to

change the entire system as a "a practical solution in the meantime," thereby increasing the risk that a station will not be correctly identified. Ofcom cannot be seen to be changing rules with the effect of increasing that risk.

Surely the solution is to deal with the Intermediate Licence once, and permanently, while bringing consistency? The ITU MAA-MZZ block is allocated. Change 2(E)0 to M2, That leaves 4,7,8 and 9 available for use for all there licence levels in the future - which is approximately 875,000 call signs for future use before the three letter suffix has to become a four letter one.

In short, strongly disagree with the proposal and urge that the basic Licence number should begin with M + a digit (i.e. a station based in Scotland would follow that pattern) and retain the RSL as a mandatory requirement. This seems to me to solve all the problems, provide absolute consistency, and ensure that the station can be identified at all times, with additional regional granularity included.

**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, it will not make the provisions clearer and I agree that there is ambiguity. Simplicity is achieved by accepting that there are only two classes of operation - (1) at the Main Address and (2) elsewhere.' Alternative, 'Temporary' and 'Mobile' cause the confusion but are all part of the second class. One letter - M for Mobile - as a suffix covers these cases unless an additional level of granularity is required to define if the station is not only not at the Main address but is actually moving, which is a nonsense.

Only Full Licence holders can operate Maritime Mobile. Thus the use of either 'M' (mobile) or 'MM' (Maritime Mobile) would cover all cases of use away from the Main address and it becomes implicit that only one form can be in use at any time, thereby removing the ambiguity about simultaneous use in more than one location.

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

Yes, if it is made explicit that 2.97.1 and 2.97.2 are only permissible on the request of the Incident Commander or those directly responsible to him/her via the recognised and authorised chain of command.