

Title:

Mr

Forename:

Tony

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:

I have held a full (Class A) Amateur radio license in the UK since 5 September 1979.

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

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circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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. I strongly disagree with 2.61 b) a valid call sign for the station be transmitted as frequently as is practicable during transmissions to ensure that the station is clearly identified;

The current time period of 15 minutes is fine. It could be adjusted to "approximately 15 minutes" etc. but removal of a specified time requirement could lead to abuse especially by those who wish to cause deliberate interference to other Radio Amateurs. Recent enforcements by the FCC in the US have highlighted this issue.

It is also important to insist that identification is made on the same frequency as the transmissions and in the same or suitable transmission mode. Again, this could otherwise be abused.

Leaving these requirements open to individual interpretation reduces Ofcom's ability to serve enforcements on those who seek to abuse the privileges of their licence and the rights of other users.

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 existing system has worked well for decades. Who now says it is ambiguous? Not only have UK radio Amateurs been quite happy to adjust their callsign in accordance with their operating location when not at their main station, but internationally each UK region is recognized as a separate entity for awards programs perhaps the most widely used one being the American Radio Relay League's DXCC award. Removing the current requirement for the callsign to reflect the region of operation will throw these into chaos and confuse all operators and your objective set out in 2.65 will not be met.

In the case of Ofcom and other spectrum users wishing to identify an operator's main station address when they may be using an RSL the answer is very simply to use the callsign's initial letter and suffix only. e.g G*9AAA For example where * is the RSL. This is exactly what Radio Amateurs themselves do and it is not complicated.

In my opinion the use of the RSL should not be optional and it should be used to indicate the current region of operation. While this may not be important from a regulatory point of view it will fundamentally alter the recognition of each UK & crown dependency region as a separate awards entity internationally.

One thing I would strongly suggest is the use of the same RSL's for every license class. What has confused matters historically is the additional RSL's available to club stations however I do not know how widely those are used in practice.

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. Please see my answer to question 7. I believe that the RSL needs to reflect the current location. However, there is a clear need for the overall modifications proposed.

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