Title:

Mr

Forename:

Ian

Surname:

Kendrick

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

Keep organisation confidential

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 - Not as proposed. I fully agree that the bands should be made available to all Full Licence holders but in exactly the same way as other bands which amateurs already have access to on a Secondary basis. The standard wording should be enough i.e:  "Secondary. Available on the basis of non-interference to other services inside and outside the UK".  Some of the proposed clauses raise concerning precedents that if they were applied to other bands would make huge

changes to specific aspects of amateur radio in the UK. Paragraph 2.26.6 is the most concerning, and should be deleted entirely, as should the phrase 'electronic equipment' in 2.26.3.  As it’s written the proposal protects equipment that’s failed the tests which allow it to be put on the market and yet were affected by RFI. Why they should be protected is difficult to understand. As regards Paragraph 2.26.6, near-field measurements are difficult to determine with any degree of accuracy and are irrelevant at the power levels in use. Clause (e) in Notes to Schedule1 of the existing licence is sufficient and doesn’t need to be reinforced in relation to the 472kHz entry.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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, but a failure to re-register should be followed up in a timely manner so as to keep the licence database as up-to date and accurate as is practicable.

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 - Not as proposed. The clear definition of callsign usage and the current maximum interval of 15-minutes should be retained. It would be helpful to the amateur community to require that a callsign be transmitted at the end of a period of transmission for example when closing down, changing frequency or changing mode. However, I do support the requirements that a station must be clearly identifiable at all times and that the identity is given in a format consistent with the type of modulation in use. Specific terms - such as voice or Morse Code - shouldn’t be used.

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 - there is absolutely no need to change currently mandated, and widely accepted, practice. Any change to current practice will undoubtedly lead to confusion and disruption - nationally and internationally. To change this would do away with more than 50 years of practice, which is widely understood throughout the world and would create far more confusion than allegedly exists at the moment.

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 disagree - All callsigns should be treated in the same way - by keeping the current clause in respect of the callsign prefix.

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?:

Bringing 16(1) into 2(1) would upset the continuity of 2(1) and 2(2). That continuity should be retained. My view is it’s better to leave it as it is.

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

Yes. Consideration should be given to WHO encrypts the message. If an amateur is handed a message by a User Service - the meaning of which may only be clear to the User Service - then the amateur should pass that message as it is. The idea of an Amateur doing encryption/decryption could under certain circumstances have unintended consequences - for the User Service and perhaps in activities where encryption wasn’t ever envisaged.