

Title:

Mr

Forename:

Simon

Surname:

Kennedy

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, not in the manner proposed. It is welcome that Ofcom are proposing to make these bands available to Full Licencees, however, I suggest that the method of doing so be the same as for other bands where amateur radio is a secondary user. The existing licence wording is clear and concise and should be used.

Also, the wording "The station must not cause interference to, and may not claim protection from other wireless telegraphy or electronic equipment." seems to introduce a fundamental

change to the licence. If this was deliberate it should be subject to a separate consultation given the far reaching nature of its effect to the amateur radio population. Otherwise it should be removed.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

I agree that this does seem to be a sensible approach to take.

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'?:

I agree that this does seem to be a sensible approach to take.

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?:

I agree that this does seem to be a sensible approach to take,

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?:

I agree that this does seem to be a sensible approach to take.

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 do not agree. The current wording is clear to me and most other radio amateur licence holders. The proposed approach is less clear and more convoluted than the existing clause. For example, what does "a station must be clearly identifiable at all times." mean. Identification every second, minute, 5 minutes, 30 minutes? It is nonsense.

Also, the proposed clause "the station's identity be given in voice, Morse Code or a format consistent with the modulation in use." is also very poorly worded. Including the section "a format consistent with the modulation in use." negates the need to specify "voice, Morse Code" in the first part of the clause.

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 do not agree. The current solution is well understood and to change it would have the potential to create confusion. A better approach would be to ensure that all licences are issued WITHOUT RSL's included so that every licensee has a G/M/2 prefix on their licence but the licence, as currently written, enforced the use of the RSL. I.e do not issue licences with MW/MM/MI etc on the licence document.

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 do not agree. This introduces a different way of operating for Intermediate licensees which is illogical.

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?:

These changes appear to be a sensible clean up of the licence clauses 2(1) and 16(1).

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

I support these changes.