

Title:

Mr

Forename:

Mark

Surname:

Kent

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?:

none.

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

The RSGB, and its affiliated clubs and members, play a key role in STEM education in the UK, from the foundation training given to so many young people, through to international standard research performed by universities and individuals under the auspices of the amateur licence and the RSGB's support.

The RSGB are the key representative of Radio Amateurs in the UK and have always been fully and properly consulted.

The very recent move to a referendum model is not, in my opinion, reasonable, at least not without a proper political review, and with the clear support and approval of the elected

government and academic parties with responsibility for STEM subjects. The potential for damage to the UK's STEM education, training and research base if inappropriate changes are made to the licensing regime due to the lack of wider consultation is almost unlimited, and the lack of recognition of the importance of the RSGB seems most undemocratic.

In my view, where changes need be made, then they ought to be agreed with, and possibly even proposed by, the RSGB, before any wider consultation be made.

All of the issues in this consultation could have been resolved directly with the RSGB, without the complexity and expense of this process, and the huge risk of missing out on the views of perhaps thousands of Radio Amateurs who have not been contacted and are not aware that this is going on.

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 agree that the bands should be made available to all Full Licensees but in exactly the same way as other bands to which amateurs have access on a Secondary basis. The standard wording applicable to other amateur bands is ideal and simple i.e:

"Secondary. Available on the basis of non-interference to other services inside and outside the UK"

In addition, if some of the proposed clauses were subsequently applied to other bands, this would massively change specific aspects of amateur radio in the UK. In order to resolve this, Paragraph 2.26.6, should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3 as it is too broad to be useful.

With respect to Paragraph 2.26.6, near-field measurements at these frequencies are very difficult to determine with any accuracy, and are not useful at the power levels in use. Clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not need any change in relation to the 472kHz entry.'

With the amendments as I propose above, I should support the reworded delta.

The RSGB should be able to agree suitable text on our behalf, proposing and amending as required, in order to keep the load from Ofcom in resolving this issue.

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, I agree that this will help the club's call sign to remain with the club. The RSGB should be able to propose and work suitable changes on our behalf as radio amateurs.

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, I agree that this change will be useful.

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?:

Agreed.

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?:

Qualified yes, what would the new wording be? I should like to see this before agreeing to it, or, the wording could be agreed with the RSGB on my behalf.

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. The current call sign announcement on QSY and every 15 mins is good, well-understood, and helpful for Radio Amateurs to be sure that they are in communications with legitimate stations (a licence requirement).

However, some simplification could be achieved by permitting the use of the current mode and/or modulation method rather than insisting on voice and morse in all cases.

The RSGB should be able to propose suitable text for a preferable amendment which would achieve simplicity whilst meeting the need to identify stations.

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 confusion which this would cause both in the UK and globally cannot be understated. It's likely that Ofcom would be flooded with clarification requests, including a stream of licence variations, temporary address changes or what have you in order to circumvent the problems this proposal would cause..

50 years of practice, understood throughout the world cannot be readily abandoned.

A return to the accepted practice is much preferable. If necessary, the RSGB should be willing to help with crafting clarifications on this which could be held on both RSGB and Ofcom pages in order to reduce traffic to Ofcom phone lines.

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 call sign/licence classes should be treated equally by retaining the current clause in respect of the callsign prefix'

If there be an underlying reason for this change, then perhaps it could be discussed with the RSGB?

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, I do not agree that such changes should be made without the RSGB's agreement to the new text.

The RSGB should be able to propose suitable new text here which would then be agreeable.

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

No, I cannot respond on Raynet's behalf. Ofcom should consult both the RSGB and Raynet on this subject, who represent Radio Amateurs and Raynet members specifically.