

Title:

Mr

Forename:

Chris

Surname:

Kirby

Representing:

Self

Organisation (if applicable):

G4FZN

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:

Thank you for the opportunity to respond to this consultation. I would comment in general that Ofcom's understanding of Amateur Radio operating practises does not appear to be as thorough as it used to be in the old Radiocommunications Agency days. The feedback given to the Ofcom team at the pre-consultation event at Newark last year seems not to have been taken on board prior to issuing this consultation.

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; this is a positive step in simplifying licensing matters and is welcomed.

The obligation not to cause interference to other services is covered in the general terms of the Amateur Licence, and further restrictions in respect of these frequency allocations should not be needed.

The requirement, for example, that the operator of a station operating in the 5MHz band can be contacted by means of a telephone in close proximity to the station is (a) vague (would a telephone in the main house when the station is established in an outbuilding be considered "close proximity" for instance) and (b) is discriminatory to those who choose not to subscribe to a telephone network or do not wish to divulge their telephone number or are disabled and unable to use a conventional telephone.

Furthermore, the proposal does not place any obligation on the operator to actually answer the telephone during the period of operation! When operating from a temporary location (such as a holiday cottage or from a remote hilltop) - how is anyone going to know the number of the telephone in any case?

For the above reasons, the additional restrictions (other than power and antenna height which can easily be incorporated into the schedule) are not supported.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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; this proposal is fully supported.

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; this proposal is fully supported.

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; this proposal is fully supported.

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 obligations for identification are adequate and would cover the requirement for identifying the station when operated in the 5MHz band. I see no compelling reason for change to identification requirements.

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 writer strongly disagrees with the proposal.

The current practise (and the understanding of 99% of Radio Amateurs) is that the callsign used by the operator identifies both the operator AND the general location of the established station. To say there is uncertainty may be technically correct - but if this is the case, it should be addressed through better education/training. In addition, the examination syllabus and the examinations at all levels could be strengthened in this area.

The use of an RSL (or lack of one for Full and Foundation licensees operating in England) to identify the location of the station should continue to be mandatory as is the current understanding of 99% of licenced radio amateurs. Making it optional has many unintended consequences and is unwelcome.

It would cause confusion around the world and cause difficulties for contest participants and organisers. The various award scheme organisers and participants would also be thrown into unnecessary turmoil.

The current system works and is understood around the world. Please leave it as is.

It is a trivial task for a official when he or she wishes to identify the operator of a station to check the callsign with or without the RSL.

The location of the station at the time it has been established and is in use is the over-riding factor to determine whether or not the addition of an RSL is required.

For instance, the very idea of an operator from Jersey establishing and operating a station in Scotland using the Regional Secondary Locator allocated to Jersey or even operating without the Scottish RSL is a ludicrous proposition and a recipe for confusion.

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. The callsign transmitted should reflect the location of the station established by the Intermediate callsign holder.

The writer finds it hard to believe that any Intermediate licensee has ever transmitted the callsign of the station he or she has established without inserting an RSL. If this has happened, it is due to poor training, and can be addressed through strengthening the exam syllabus.

The need to address this point is down to Ofcom's incorrect formatting of licences - and has not (as far as I know) led to the actual transmission of callsigns in breach of the Radio Regulations.

Whether Foundation, Intermediate, or Full, the callsign used at the established station can identify both the callsign holder AND the general location of the station. A trivial search on the Ofcom database with and without the RSL can easily identify the callsign holder, and the RSL (or lack of one in the case of Foundation and Full licensees) can easily identify the general location of the station.

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 view expressed.

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

The writer welcomes the proposed changes as set out, but is not of the view that it will actually clarify Raynet operation under the Licence.

The proposed changes are welcome, however, as they widen the scope of Raynet to provide emergency communication services when requested to do so.