

Title:

Mr

Forename:

Stephen

Surname:

Knowles

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?:

YES Ithough I have no personal interest in operating on these frequencies.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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

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. There is nothing wrong with the current Clause 13 except, perhaps, that the current 15-minute time period allowed between IDs is too long.

"Identifiable at all times" is a good concept, but how can it work if a station can lawfully transmit via (say) PSK31 a file that takes 90 minutes to send and is not obliged to break it to identify?

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 identity of a station is NOT the same as the LOCATION of the station. In all the 49 years I have been licensed I have NEVER met anyone who did not understand how the RSLs work, so I do not understand where the stakeholders referred to were found! Possibly within the VHF community, where interest in Countries is understandably less.

However, at HF, for at least 70 years (and possibly more) our Regions have been regarded, within the Amateur Radio community, as separate entities. Innumerable international award schemes and the World's most prestigious competitions depend upon being able to identify a station's location from their callsign. So, for us, the home station address of the licensee is not important ... the location of the station IS!

Worldwide, most authorities, including ITU, understand the present arrangements. I suggest that change is not necessary. However, if it were to suit OFCOM I would be happy to have

my licenced callsign changed to G3UFY, providing the requirement to include the RSL APPROPRIATE TO THE LOCATION OF OPERATION remains in the licence.

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

As in my reply to Q7, what is important to Amateur Radio operators is the present location of the station, not their home address.

By all means issue a licence with the callsign 20xxx, but make the inclusion of the RSL mandatory.

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