

Title:

Mr

Forename:

David

Surname:

Kurdziel

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 I don't agree.

These band should be available allocations are available, ie on a non interference basis.

Paragraph 2.26.3

"The station must not cause interference to, and may not claim protection from other wireless telegraphy or electronic equipment."

It has always been understood that amateur operations should not cause interference to other wireless telegraphy. The problem here is the last two words, "electronic equipment" This is such a huge catch all as there is nothing that you can think of that is "non electronic" in use today. This would mean including equipment the primary function of which is not wireless telegraphy, and which were never designed or certified to operate correctly in the vicinity of a wireless telegraphy transmitter. Other electronic devices such as computer mice, bluetooth accessories, washing machines, light dimmers, etc, are non protected equipment and should not suddenly acquire protected status from nearby wireless telegraphy installations.

Paragraph 2.26.6, e. Clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not 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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

A licence issued to a club station should stay with the club station, anything that helps is to be welcomed.

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'?:

We already understand who a disqualified person is. A club station should only be able to be operated by a qualified person under a club call sign, or by a qualified person under their own station call sign with the appropriate alternative /A ident.

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?:

Nope

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?:

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 way of doing things is acceptable well understood and not difficult to comply with.

"As frequently as practicable" has such a wide range of interpretation that would render it open to easy abuse and would make it even more difficult to comply with good station identification practice.

The current way of identifying a station without making references to voice or morse is sufficient to enable a station to be identified without complications.

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 question of regional secondary locators affects more than the local UK radio amateur community.

The system as it stands is well understood by amateur operators here and abroad, it does work well, and any change is only going to cause more confusion and error than is alleged to exist at the moment.

I can see no justification for changing the current system.

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 don't agree.

All licencees should identify with a call sign that reflects the location of the station at the time of transmission.

There is no need for intermediate licencees to mask location of their transmissions if different to the main 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

As it is worded I can't see how

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

No

The proposed wording is still too ambiguous.