

Title:

Mr

Forename:

Kit

Surname:

Lane

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?:

Not as your wording currently proposes.

The standard secondary allocation wording would make it more consistent with all other amateur allocations.

The requirement to not interfere with "electronic equipment" is extremely widely drawn and introduces an entire new expectation of guaranteeing immunity from interference from a legal operation.

Electromagnetic compatibility legislation has helped reduce interference issues, however the new trends of Ebay etc. bringing in potentially un type certified equipment from the far east has the potential to undermine this. There is the potential for this new rule to require amateurs to not interfere with equipment that is poorly made and non compliant of EMC regulations. It also says we should not expect any protection from said devices!

This would seem to undermine the very purpose of both having licensed space and indeed having EMC regulations at all!

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

Sounds an extremely sensible and practical idea.

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. If something isn't actually automatic its probably wise not to say it is!

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 will be honest here and say it looks a bit like a way of setting in motion a method of seeking a payment! However I will take you at your word this isn't the intention as you have stated it.

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?:

I am fairly unconvinced this rule should be changed. It is easily understood and benefits from being over complied with not under complied with in my experience on the bands. The rule isn't worded as is that you must transmit exactly at 15 minutes, so there really is no onerous timekeeping aspect.

I don't have any experience of very low frequency operation or the more exotic datamodes that I presume perhaps take much longer to send data and thus the 15 minute rule is a serious

burden? If this is the case, there is an argument for varying the requirement for certain types of operation or frequency. I don't have the experience to know this however.

Given the only reasonable and responsible thing to do when asked to identify your station is reply with your callsign I am not sure what problem this is seeking to resolve!

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 - this is a reasonably terrible idea. The secondary locations are extremely useful in situations where you have a directional antenna. When I have worked as a mobile or portable station I have really had no difficulty what so ever changing my callsign as appropriate with the country I am in. I have never had any station I am in contact with express any confusion or concern at this happening.

From your legislative position I can understand why you feel identifying a station main address is the most useful thing, but from working radio point of view, its actually the current location of the transceiver that is much more helpful. Figuring out the stations home address from any regional callsign isn't very hard.

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?:

I think you should have a set of rules that make sense across your licenses. The rules should be harmonious to keep them simple and easily understood.

I personally feel the RSL should reflect where you physically are at that time, and that should be the case regardless of license class.

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?:

On the whole this is very sensible, however I would say that excessive use of encryption beyond that which protects certain critical data may increase the number of complaints you receive about frequency misuse.

With open signals it is possible to identify and understand who is using the frequency for what. There is a small risk that allowing encrypted traffic onto the bands regularly opens a

window for other non licensed users to start doing similar and rely on the encryption to help prevent them being detected. This would be doubly dangerous if said people started using common RAYNET frequencies!