

Title:

Mr

Forename:

Steven

Surname:

Marsh

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:

From G4TCU

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?:

Q1 I agree that the 470kHz and 5Mhz bands should be allocated to the full amateur licence but I do not agree that additional or different restrictions should apply.

I do not agree with paragraph 2.26.3. The development of 'electronic equipment' and new technologies is very fast in the modern world. This clause basically states if a new technology or piece of equipment comes along which interferes with Amateur reception then we have no protection. Additionally if a new technology or even a poorly implemented existing technology suffers because it is not suitably protected from EMC, then we are to blame. This arrangement is far too one sided. The phrase 'electronic equipment' in 2.26.3 should not be used and the bands should be made available to all Full Licensees in exactly the same way existing bands are i.e. on a Secondary basis.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

agree that a club call sign should be linked to the club and not to an individual.

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'?:

I agree that if Ofcom feel it necessary they should add the phrase 'disqualified person';

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?:

I have no opinion either way.

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 have no opinion either way.

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 I disagree, clause 13 works perfectly well as stated. I see no reason to change the existing arrangements. Identifying at the beginning of a QSO and at a maximum interval of 15 minutes thereafter seems a practical arrangement. If more frequent identification is required then a maximum term should be stated, simply saying 'as frequently as practicable' is a nonsense. How can something this arbitrary be regulated ?

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 I disagree. There is no uncertainty or misunderstanding on how regional locators work amongst radio amateurs. It seems that Ofcom have muddied the water relating to this and any misunderstanding is on Ofcom's behalf. The existing regional identifiers work perfectly well as they are. A regional identifier should be added to the callsign from where the amateur is physically operating from at that time. I see no need to change them or make them optional.

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?:

A regional identifier for all licence classes should be added to the callsign from where the amateur is physically operating from at that point in time. All call sign classes should be treated in the same way and no changes are necessary.

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 don't agree it will make things clearer, no changes are required.

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

I have no opinion either way.