

Title:

Mr

Forename:

Ian

Surname:

Mccarthy

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

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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

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. The existing requirements are adequate to ensure reasonably frequent/appropriate identification without being in any way onerous. The proposed changes are nebulous by comparison and fail to address your desire to clarify the requirement.

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 ABSOLUTELY NOT. For well over half a century the RSL has been deployed to reveal the region in which a station is operating. It has never been used to define the main station location or the address set out within the licence. What is proposed would turn upon its head a practice which has served the amateur community well having worked most effectively for many decades.

The only people likely to misinterpret Clause 2(2) can be those lacking experience within it. The wording seems very clear and interpretation should be obvious for anyone with even a little experience.

"2(2) The Licensee shall use the following appropriate Regional Secondary

Locator after the United Kingdom Callsign prefix "G", "M" or "2" as specified

in Section 1, when identifying the Radio Equipment in accordance with

Clause 13(1):"

1. The term, "The licensee shall use" is clearly a mandate not discretion. Had discretion been intended the phrase, "The licensee may use" would have been appropriate.

2. The term, " the Radio Equipment" logically and practically relates to the radio equipment in use for the purpose of the transmission taking place. To assume it relates to equipment left at home, equipment owned on the date the licence was issued or indeed any other equipment which is not in use is both spurious and a logical nonsense.

To the extent that confusion exists this might be best addressed by clarification in support of over half a century's custom and practice.

Quite simply; make use of RSL a requirement whenever the station is operated in a region with an allocated RSL.

Ofcom may consider there to be no regulatory necessity to require RSL use to be mandated in this way. Likely this is correct. Indeed it is likely there has never been a regulatory necessity for it. Despite this RSLs have been used in this way for more than 50 years. No change should therefore be made without regulatory imperative requires it.

The change proposed will have significant impact upon stakeholders within the UK and around the world for whom the change will create significant confusion, clarifying nothing at all.

PLEASE DO NOT PROCEED AS PROPOSED.

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 proposed approach is unhelpful for the reasons given in answer to Q7.

A sensible approach from a licensee perspective, informed by over half a century custom & practice, would require the RSL applicable to the region in which operation is taking place be inserted between the leading and second digit of Intermediate licence holder call signs. In cases where the licence document issued by Ofcom has incorporated an RSL this should be replaced as appropriate by the RSL allocated to the region in which operation is taking place.

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

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