

**Title:**

Mr

**Forename:**

Guy

**Surname:**

Morgan

**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:**

I am a licence holder (G3POM) of more than 50 years standing.

**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?:**

I do not agree with the proposal as formulated

I agree that the bands should be made available to all Full Licensees; however this should be on the same basis as other bands to which amateurs have access on a Secondary basis. The present wording applicable to these bands should suffice i.e:

"Secondary. Available on the basis of non-interference to other services inside and outside the UK"

Some of the proposed clauses appear to set precedents which, if subsequently applied to other bands, would substantially change particular aspects of amateur radio in the UK. To address this Paragraph 2.26.6, should be omitted entirely, as well as the phrase 'electronic equipment' in Paragraph 2.26.3

With respect to Paragraph 2.26.6, near-field measurements at these frequencies are very difficult to make with an acceptable degree of accuracy and in any case are not relevant at the power levels in use. Clause (e) in Notes to Schedule1 of the existing licence covers the situation and is sufficient in relation to the 472kHz

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**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

This seems a reasonable proposal and would make recovery of the club licence by existing members easier if the licence holder has left the club and is uncontactable.

**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, not as at present proposed but see para 2

A clear definition of callsign usage is essential and the current maximum interval of 15-minutes should be retained.

However I support the requirement that a station must be clearly identifiable at all times and that the identity must be given in a format consistent with the modulation in use, provided that the specific reference to terms such as voice or Morse Code should be removed.

**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 - there is no need to change current mandated and widely accepted practice.

Any change to current practice will lead to confusion and disruption both nationally and internationally. To enforce a change would do away with more than 50 years of accepted practice, widely understood throughout the world. It would create far more confusion than is currently alleged to exist. My own experience shows no evidence of this alleged confusion.

**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 strongly disagree - All call sign classes should be treated in the same way by retaining the current clause relating to the callsign prefix

**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?:**

I personally do not find the present clauses confusing so do not see a need for greater clarity.

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

I am not sufficiently familiar with RAYNET operation and the need, if any, for clarification to comment usefully.