

Title:

Dr

Forename:

Ron

Surname:

Mount

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?:

With some reservations, viz:

2.26.2 Unnecessary. This is standard anyway, surely? (Licence section 16)

2.26.3 More restrictive than Licence 5(1)(b)

2.26.6 Accommodated by Notes to Schedule 1 (e),so unnecessary

2.27.8 Better to unify this with general giving of call signs?

2.27.11 How can this be realised? Where would Full licence holders register their contact numbers?

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

Not completely.

The requirements that a station must be clearly identifiable at all times and that the identity be given in a format consistent with the modulation in use are OK but specific modes need not be specified in the licence. Suggest the net restriction of giving call sign on exit from net (as for 5MHz) is added - most people do this anyway - then it isn't needed as a special 5MHz restriction.

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?:

I have never encountered any significant confusion. Call signs should be issued in generic form e.g. M0ABC, even to a Scot, and all constituents of the British Isles should continue to define their country of operation at any time accurately by using the RSL.

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. All of us should be identifying our location of operation, including Intermediate & Foundation.

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?:

Mostly, but I believe that some countries recognise the Foundation and Intermediate licences as equivalent to licence classes of their own and allow our licensees to operate subject to some restrictions. 2.88 would seem to preclude this, which would be a shame.

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

Sounds OK though I have no real knowledge of Raynet requirements.