

**Title:**

Mr

**Forename:**

Graham

**Surname:**

Murchie

**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 Chairman of the RSGB but this submission is made as an individual radio amateur.

**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?:**

No - Not as proposed. I agree that 472kHz band should be made available to all Full Licencees but in exactly the same way as existing bands to which amateurs have access on a Secondary basis. The standard wording applicable to other amateur bands should suffice i.e:

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

The 5MHz band should be considered separately in view of the November 2015 WRC-15 date when the outcome of the ongoing studies in CEPT and ITU will be known.

Furthermore some of the proposed clauses set concerning precedents that if subsequently applied to other bands would radically change specific aspects of amateur radio in the UK. Of particular concern is Paragraph 2.26.6, which should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**

Agreed - This proposal would be a useful contribution in view of the many club issues that are raised on a regular basis.

**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'?:**

Agreed - This is reasonable in order to remove current anomalies as described.

**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?:**

Agreed - This will more accurately reflect due-process and practice with respect to revocation of licences due to non-revalidation.

**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?:**

Agreed providing that the fee-charging regime does not change significantly.

**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 proposed. A clear definition of callsign usage and the currently well understood maximum interval of 15-minutes should be retained. 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 supported (but that specific terms such as voice or Morse Code should not be used).

**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, definitely not - there is no need to change current mandated and widely accepted practice. Any change of current practice will lead to both confusion and disruption both nationally and internationally. To do otherwise would do away with more than 50 years of practice, widely understood throughout the world and would create far more confusion than is currently alleged to exist. Ofcom needs to be consistent in issuing licences that are all in the same callsign format. These inconsistencies over the last few years are what has caused the confusion. Clarifying Section 2(2) of the Licence is what is required - see the RSGB submission for the detail of this.

**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 absolutely disagree - All call sign classes should be treated in the same way by retaining the current clause in respect of the callsign prefix. It would be discriminatory to do otherwise. To make the change that the question poses would have significant impact and cause immense confusion both in the UK and globally

**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?:**

Agreed. Ofcom should address other known editorial issues including:-

- Deletion of Clause 17(1)(kk) on 'Tidal Water', which is redundant
- Clarification around 17(1)(d) and 11(1) so that communications can more clearly be with any licensed amateur, rather than just UK ones
- Making a clearer distinction between Remote Control and Unattended Operation in Section-10

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

I agree with 2.97.1. For 2.97.2 it should be absolutely clear that this 'message content' does not affect the requirement that amateur stations be clearly and regularly identified by their callsigns.