

**representing:**

Self

**Organisation (if applicable):**

**What additional details do you want to keep confidential?:**

Keep part of the response confidential

**If you want part of your response kept confidential, which parts?:**

My name and amateur radio callsign (which is in Additional Comments).

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**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 the bands should be made available to all Full Licencees but in exactly the same way as other 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"

Furthermore some of the proposed clauses set 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.

Paragraph 2.26.3, as it stands, is a statement which has never been included in the licence schedule and is at variance with Ofcom's normal practice of not investigating interference experienced by non-radio-related equipment, i.e. equipment not designed to receive wireless telegraphy signals.

With respect to Paragraph 2.26.6, near-field measurements at these frequencies are very difficult to determine with any accuracy and in any case are irrelevant at the power levels in use. Clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not need to be reinforced in relation to the 472kHz entry.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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

**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, in principle, with this proposal. However there is a need to be mindful of the provisions of the Rehabilitation of Offenders Act, under which most convictions become "spent" after a certain period of time. In some circumstances it is unlawful to disadvantage a person by reason of a "spent" conviction.

**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, I agree that this change would more accurately reflect the procedures which are actually followed by Ofcom.

**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, I agree with this proposal.

**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 current maximum interval of 15 minutes should be retained. The proposed phrase "as frequently as is practicable" is far too ambiguous and would be unenforceable. However 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 specific terms such as voice or Morse Code should not, and need 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?:**

Emphatically NO - there is no need to change current mandated and widely accepted practice. I am not aware of any confusion within the amateur radio fraternity arising from the present, long-established procedures. On the contrary, any change of current practice will lead to unnecessary 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.

**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. There is no need for any change to existing procedures and Intermediate licencees should not be treated differently from other licence classes. The appropriate RSL should be transmitted to indicate the current location of the station; not the home address.

**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?:**

Yes, I agree with this proposal.

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

No comment, as I do not participate in RAYNET activities.