

Representing:

Self

Organisation (if applicable):

What additional details do you want to keep confidential?:

Keep name confidential

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

Only name & Call sign (PII)

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?:

While not intending to use these bands in the immediate future. I would like to see the term "or electronic equipment" in section 2.26.3 removed, The current requirements over interference to other radio equipment are valid but as it is not normal Ofcom practice to investigate interference to non-radio related equipment, I can see that this extension to the current clause could cause a lot of work for Ofcom and the Radio Amateur.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

This change would clarify the situation where a member leaves a club or committee position and tries to take the club call sign with them. Club call signs should be held by the club or nominated post holder, while they are "in post". This change would clarify the position for all parties.

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 with the proposed changes, clarifying the current text is an improvement.

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?:

The term "Automatically" should be removed, as the current license revalidation requirement can be easily overlooked. (That reminds me, when did I last check). Ofcom should attempt to alert the individual before cancelling a license.

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?:

As a holder of several licenses in different categories, it makes sense that they all use the same wording in respect of fees.

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?:

I do not agree with this as proposed. A clear definition of callsign usage and the current maximum interval of 15-minutes should be retained. It has always been a topic of contention how often a call sign is given. 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 is entirely practical. Some digital modes allow for the call sign of the transmitting station to be displayed automatically, it would not be practicable to change into another mode just to give out a call sign. Specific terms or modes should not be prescriptive in Clause 13.

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 think the current system of RSL works well. There is mention of frequently changing your call sign when mobile, in practice including a change in RSL when crossing a boundary clarifies your location. Making a RSL optional is absurd. You either have it, and make it work, or remove it completely. However this would cause even more upset and argument. RSL has been in use since I got my license in 1980 and I can't see any logical reason to change accepted custom and practice.

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?:

I do not agree, the RSL location in the 2x0ABC call sign is to show the current location of the station. The main address is only for administrative purposes. If there is interference then the current location of the station is what is required. All amateurs should use the RSL system in

a consistent way. (But I am not suggesting that G8 changes to GE8 when in England). Sorting out the issue in section 2.80 is preferred, rather than changing the rules and causing confusion.

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, clarification is required.

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

Yes, I support all the proposed changes. Section 2.97.2 is long overdue as some information and messages containing PII (Personal Identifiable Information) are required by other legislation to be protected in transit. Not being able to encrypt this type of information presented operational problems between user services and RAYNET.