

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?:

Name

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

I believe it is right that OFCOM review the licence, as part of an ongoing process of review covering its portfolio of interests.

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?:

Yes; provided they are included under the same terms and conditions as presently apply to other bands included in the full licence. I note, that para 2.26.3 introduces a very different concept of interference/non-interference by including the phrase "and electronic equipment". That has never been a condition of the licence, and while it is reasonable for an amateur to use equipment which would not normally cause interference, the burden of rejection must fall upon manufacturers of electronic equipment, as at present. It is unreasonable for reference to be made to an obligation on the part of amateurs to such a requirement when manufacturers are obliged to ensure their equipment is sufficiently well screened to be able to withstand exposure to electromagnetic fields generated by typical equipment used in the environment in which their equipment is expected to operate, including the presence of radio amateur equipment which conforms to the requirements of the licence conditions. Those conditions have not changed in respect of levels of harmonics or power levels, so why should manufacturers now be given leave to complain. I note that there is no mention of reasonable limits related to normal amateur radio equipment specifications, and that seems entirely unreasonable.

Para 2.26.6 seems to be based on a supposition, not proven by research, that the levels of rf emissions associated with amateur radio operation will cause biological damage. In addition,

(a) measurements of near field radiation in the 470khz are (a) difficult to make with any useful degree of accuracy, and (b) the matter is already sufficiently well covered by the existing Note to Schedule 1, in the existing licence. Unless there is solid research evidence to the contrary, I can't see there is an issue with rf levels.

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?:

I am not entirely clear what this question is proposing. Sorry.

I do not think it wise to link an individual's licence to a club or club's licence. Amateurs sometimes belong to no club at all, and linking licences and clubs would disadvantage club members. Linking an individual's licence to a club licence and revoking that individual's right to operate the club licence if s/he leaves the club seems reasonable. In general, I think a club licence should only be used by licenced members of the club associated with the licence.

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 think that if there is an amendment to make it an offence for a licensed amateur to operate a club licence if they do not belong to that club that would imply that a penalty might be that they be a Disqualified Person. It would be reasonable to make that clearer and more explicit. The wording would have to be straightforward as well as defensible.

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?:

I have no strong feeling either way. If someone doesn't revalidate their licence, they might reasonably expect to have that licence revoked. It will have been allowed to lapse anyway. Personally, I think the revalidation, while apparently reasonable, does not work as well as annual renewal by payment of a fee.

I do think that in this day and age, OFCOM (or whoever is designated to manage the licence) should remind licence holders in advance of a required validation date. That would remove a source of real stress for many amateurs, most of whom are desperate to retain their licences. The revalidation interval is too long for most people to keep track of it.

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?:

Absolutely not. The more flexibility you allow, the more operating procedures will slip. Identification is a primary requirement. Furthermore, to have different requirements for some bands (see para 2.62) is very confusing. I cannot see what is wrong with the present requirement. Nor do I believe that, in this respect, allowing an undefined degree of leeway is at all helpful.

To mention just two specific formats in the statement (voice and Morse code) is inconsistent, and at odds with your intention. The statement is more helpful in its present form, and the existing regulation should be retained. One aim of amateur radio is to provide an arena for 'self-training', and relaxing the basic requirement to identify at intervals is a reasonable part of that.

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. Where is the evidence that there is widespread misunderstanding of the present requirements? Surely not? I think it would be very unhelpful to make this change. Geographical locators are found in licensing schemes across the globe, and form an important part of many aspects of amateur radio operation in the UK precisely because they identify the location of a station.

I believe the requirement for to use an RSL should be compulsory.

Perhaps the simplest way to deal with any confusion over the regulation would be by education.

I live in Scotland, so my call begins with GM. If I operate from England, I drop the M. My call is also my identity and important to me as an individual. Under no circumstances whatsoever would I wish this aspect of my call to change. It would be like asking me to use a different first name; unthinkable. I don't mind changing the RSL when I change location, but not when I am at my registered main station address. And I do not think it should be optional to use the RSL. I cannot properly identify a station's location without 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?:

This seems an odd proposal, given the current requirement for RSLs to be used to reflect the location of the transmission. I imagine this might be designed to align Intermediate RSL practice on the assumption that the proposals in Q7 are accepted.

In any case, why pick on Intermediate Licencees?

I do not agree with this proposal.

In fact, by making the use of an RSL non-compulsory, you create further confusion and cloud what is a simple set of rules if RSLs are compulsory.

Perhaps the simplest way to deal with Intermediate licences is to make it clear that the licence contains the RSL and that part of the call should change when the callsign holder operates in

another geographical area (like my call which was issued as a GM, but which changes when I am elsewhere).

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; but only in accordance with my observations on RSL use.

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

Quite the reverse. RAYNET stations should use the RSL as it presently exists.