

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?:

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?:

No - Not as proposed. I agree that the 470kHz and 5MHz bands should be made available to all Full Licencees in a similar way to other bands that amateurs have on a secondary basis, using the same wording as in the existing licence.

I am particularly concerned with the phrase "electronic equipment" in Para 2.26.3 The use of the term "electronic equipment sets a precedent that could be later extended to other bands. It is known that some equipment sold in the UK is either illegally CE marked or is not manufactured to the same standard as the equipment sent to a Test House for certification to the EMC Directive. I suggest that the phrase "electronic equipment" be deleted from this paragraph.

With respect to Para 2.26.6 I believe that such exposure at the power levels permitted to be used by radio amateurs in the UK is irrelevant. I am not aware of a UK Standard for Maximum Permitted Exposure (MPE) at 472kHz but I have checked the FCC Standard and do not believe that any UK amateur can exceed the stated MPE at 472kHz.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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 agree. Under the existing arrangements, Clubs with, for example, call signs which relate to the initials of the club or clubs with legacy pre-war call signs could lose the use of their call sign if the individual named on the licence dies or leaves the club. The call sign should remain with the club.

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

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 agree. The wording should reflect OFCOM's practice.

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?:

I agree

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. The term "as frequently as practical" is open to a wide range of interpretations. I believe that the current 15 minute rule should be retained as there can be no argument. I see no need for voice or Morse Code to receive a specific mention unless the form of modulation or data transmission is experimental and not available to OFCOM or the general radio amateur population.

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 - there is no need to change the current mandated practice. The current Regional Secondary Locator has been in use for as long as I have been licensed, which is over 50 years. Radio amateurs in the UK and other countries immediately know in which UK country the station is located. Using the existing RSL system, OFCOM knows the station home address of a UK amateur operating in another UK country should that amateur need to be contacted for any reason. The existing RSL works well, please don't change it.

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 disagree. All call sign classes should be treated similarly by retaining the current clause about call sign prefix.

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?:

I agree

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

I agree.