### **Representing:**

Self

### **Organisation (if applicable):**

N/A

### 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 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.i.e: "Secondary. Available on the basis of non-interference to other services. Paragraph 2.26.6, should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3. With respect to Paragraph 2.26.6, near-field measurements are in any case irrelevant at the power levels in use. Clause (e) in Notes to Schedule1 of the existing licence is sufficient.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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 that expressly linking a Full (Club) Licensee's authorisation to use the spectrum to his or her representation of a named 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 that further ground of revocation in the Licence as proposed in Clause 4 with the definition of 'Disqualified Person'? is required.

### 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 that the word "automatically" should be removed from Clause 4(5) of the Licence, in relation to the revocation of the Licence.

# 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 Clause 15 should be updated.

# 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. 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.

#### 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 current mandated and widely accepted practice. Any change of current practice will lead to both confusion and disruption both nationally and internationally. Additionally it is important that the region of transmission should be retained in any definition as this is widely understood throughout the world would create far more confusion.We should be seen as using best practice to all.

# 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 in the same way with the appropriate RSL being used to indicate the location of the transmission by the station'

### 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?:

To simplify matters I agree that replacing Clauses 2(1) and 16(1) with a new Clause will make these provisions clearer.

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

I agree that the proposed changes will clarify RAYNET operation under the Licence. But I don't agree that MRT or other services use an existing repeater for none emergency's and must seek permission from the NoV holder to use an existing repeater for none amateur use as this compromises the NoV licencees.