

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 with the conditions attached in the proposal. It is desirable that these bands should be made available to all Full Licensees but under exactly the same conditions as other bands to which amateurs have access on a Secondary basis. The current wording covers the requirement and should be the only condition for including the 470kHz and 5MHz bands in the Full licence:

"Secondary. Available on the basis of non-interference to other services inside and outside the UK"

Paragraph 2.26.3 introduces into the Full license the concept of interference to 'electronic equipment'. As I understand it, Ofcom's remit does not extend to investigation or enforcement in situations of interference to non-radio equipment so this would seem to be at variance with that remit. Such a requirement has never been part of the Full license and I see no requirement for it to be added. I strongly suggest that the words 'electronic equipment' be removed from this paragraph.

Paragraph 2.26.6, appears to duplicate the requirement of clause (e) Notes to Schedule 1 of the existing license. The latter is sufficient; the reiteration in conjunction with the addition of these two bands to the Full license is unnecessary, therefore Paragraph 2.26.6 should be removed.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

It is my view that a mechanism is required to ensure that the allocation of responsibility for a named club's call sign and use of spectrum can be administered in such a way as to prevent the retention of a club license by an individual, after such individual has either left the club (through resignation, death or expulsion) or is no longer an officer of the club. The license should remain allocated to the club while such club is in existence; on departure of the currently named individual responsible for the license, the officers of the club shall be required to nominate a replacement for the club license holder.

I am agnostic as to the mechanism that ensures orderly transfer of a Club license. My only requirement is that appropriate mechanisms exist that ensure the continuity of a license within a club, and that prevent an individual from retaining a Club license after they have ceased to represent 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'?:

Yes

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

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?:

NO.

The current provisions are entirely adequate and do not cause a practical burden; at the same time they ensure that those who may be lax in their station identification can be held to a specific standard, rather than a nebulous 'as often as practicable'. The latter phraseology will lead to unnecessary confusion and debate as one person's idea of sufficiently frequent and clear identification may be very different from another's'. and either may claim that their method is conformant with the new wording.

In short, the new wording fails to achieve additional clarity (quite the opposite) and the amendment as proposed should not be included.

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?:

ABSOLUTELY NOT!

I do not support the contention that there is uncertainty amongst licensees in relation to Clause 2(2) in any general sense. There may be a few individuals, but the vast majority of licensees have been following the custom and practice of changing RSL whenever necessitated by the location of the equipment in use at the time. Contrary to wording of clauses 2.67 and 2.68 of the Proposal, the custom and practice has never been one of choice since failure to correctly align the callsign in use with the current location of the station in use would introduce substantial confusion in the receiving community locally and internationally.

The issue of 'many different identities in a short period of time' noted in clause 2.69 of the Proposal is in practice of little or no hardship in the vast majority of cases. If one drives across the border into Wales or Scotland for example, it has been common practice during the period I have been an amateur (licensed for 47 years) to highlight the fact of the border crossing in a transmission as the amateur at the other end of the link is normally interested to know that fact. At the same time, the RSL is added or removed according to the direction of the border crossing.

Clause 2.74 of the Proposal suggests that "There is also likely to be a positive impact on other Radio Amateurs, particularly those operating in other countries, where UK stations may be able to be identified in a manner that is more readily recognised". Exactly the opposite is true. If the station identifies as G5ABC but is in fact in Scotland, how is that fact recognised from the callsign at all? Whereas today if a station in another country hears GM5ABC the Scottish location is unequivocal. If necessary, there is a wide variety of reference sources globally that will tell him/her that GM is the prefix for stations in Scotland and that therefore G5ABC is operating from Scotland. No doubt or confusion at all!

The proposal would change a custom and practice that existed for at least 50 years and would impact not only the UK licensed amateur community, but also amateurs world-wide who rely on the regional identifier to determine the location of the station they are currently contacting. The location from which the station is currently operating is used to validate international and national awards and in the adjudication of international and national competitions. The proposal introduces a degree of uncertainty and confusion which will be devastating to such awards and competitions (which number in the 1000s with total annual participation measured in the millions). The UK has a significant number of highly respected individual and Club licencees that compete at the highest levels of international competition and are well respected for their achievements. The proposal throws into doubt their continued ability to compete, as the international contest rules require that participants correctly and completely identify the location of the operating station by means of the appropriate geographic identifier - which for the UK means the RSL included in the callsign in accordance with the physical location of the station in use.

The current Licence Clause 2(2) is already rather clear: "The licensee *shall* use the appropriate RSL..." If away from the main station, it clearly mandates that the operation shall use the RSL appropriate to that other location, since that other location is where the Radio Equipment is being used.

The major uncertainty and substantial confusion introduced by the proposal far outweighs the possible slight confusion that could occur with the current wording. If there is confusion over the current wording (very hard to understand as the wording is abundantly clear) then a clarifying sentence under Clause 2(2) could be added such as "For the avoidance of doubt, it is the location of the Radio Equipment in use that governs the selection of the RSL which shall be used with call sign at that location, regardless of the RSL in use at the Main Station location".

I STRONGLY URGE THAT CAUSE 2(2) BE RETAINED with brief clarifying wording added in line with the above..

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 see no justification for treating Intermediate Licence identification differently from Full and Foundation licenses. The Proposal is unhelpful and will introduce uncertainty and confusion as detailed in the answer to Q7.

Intermediate Licensees should be subject to Clause 2(2) as noted above.

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

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

Yes