

**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?:**

I am in favour of this change, however some aspects of the wording should be altered to fit in with the existing licence requirements for secondary allocations.

I am particularly concerned with the proposal to require non-interference with electronic equipment rather than simply wireless telegraphy equipment. I think that this should not be expressed at all. Furthermore I am concerned that stating specifically that protection from interference from electronic equipment is not provided means that recourse to other applicable legislation and regulation would be affected, removing the opportunity to deal with interference caused by poor design or regulation.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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

**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':**

Provided that such a change links revocation to specific behaviour in respect of abuse of radio spectrum and services I am in favour of it.

I do, however, think that care must be exercised to avoid a person's history or character being used to justify licence revocation. A clear expression of the behaviours that do allow such a step should be included in this change.

**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, there are often reasons for temporary lapses in administration of such licences and immediate revocation seems unnecessary in the first instance.

**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, I agree with this change.

**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 am not in favour of making Clause 13 more prescriptive, the proposal does not improve the clarity in my opinion. All that is required is to remove ambiguity in regard to what "a period of transmission" means by explicitly stating that it does not mean an "over" but instead the whole duration of a contact with a particular station.

I do want to see it made acceptable to use frequently used mode and modulation types for identification purposes, this is entirely sensible in the light of the increasing use of non-voice or Morse code modes.

**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?:**

As a licensee of some 35 years I do not find that the existing licence conditions are difficult to understand, I am not in favour of changing the well understood practice of changing the current RSL letter to indicate the current regional location of the station.

My only exception to this is in the case of mobile operation where movement across regional borders may occur with an operator that may not be familiar with the area. In this case I believe that it should be acceptable to omit the RSL letter entirely unless it is a fundamental part of the callsign (2E series callsigns) or to use the RSL letter associated with the main station address.

**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 think it is wise to impose a different standard on any particular licensee dependent on class of licence.

I believe that the requirements for the Intermediate Licence should be the same as those for all other licensees.

**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 that a clarification of these clauses would be beneficial provided that the change brings clarity and does not leave open the ambiguities described in the consultation. In this respect it might be better to have a slightly different wording for club licences or to have 2 mutually exclusive clauses where only 1 is applicable to either an individual or club licence.

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

I am in favour of these changes provided that it is clear that they only apply in the case of operation in support of the emergency services and are not a general licence condition.