

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?:

Yes - but not as currently proposed in the document. It would be more sensible to apply the standard wording found in reference to other bands, e.g. "Secondary. Available on the basis of non-interference to other services inside and outside the UK".

The requirement that is stated in paragraph 2.26.3 that interference must not be caused to and must be accepted from "...electronic equipment" is far too vague. At the very least, this statement would include devices which do not meet the EMC requirements laid out in legislation and emit RF on these frequencies, which is obviously not correct.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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 - ideally the clubs licence should be transferrable from one office bearer to another. This would be most beneficial if it were possible to update the name and address of the licence holder as required under the electronic licensing scheme (e.g. if the club secretary for example of club GM3xxx died the new club secretary could take it over and the club would keep it's callsign). This makes much more sense than the current system.

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 - as mentioned in the consultation document this is actually misleading and not a representation of the actual process undertaken.

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 - although I would be most disheartened to see the regulations changed and a fee charged for the electronic licence as a result of the 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':

Not as proposed. The term in 2.6.1 "...as frequently as is practicable..." is far too open in my opinion. This could be seen as a requirement to transmit the callsign on every 'over' (not impracticable, but obviously too often to be sensible).

The current requirement for 15 minute maximum intervals are tried and tested. Radio operators are used to them and there seems no real need to change.

I agree with the sentiment of the section regarding type of transmission / modulation but a lot of the wording could be removed and replaced by "By the same type of modulation as is being used for the transmission" or similar.

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':

I have never met, nor have I heard of an amateur confused by the RSLs. Indeed, as they are part of the assessment syllabus you need to know them now in order to obtain a licence in the first place.

I feel that to change the current requirements would lead to confusion both within the UK and elsewhere.

I believe the current system has been in place for half a century or more and to change it now would do more harm than good.

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 fele this ties in with my response to question 7 - the current system should be kept

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 - as a RAYNET member, this would make me feel much more comfortable than the current system which leaves operators open to being found in contravention of clause 11(2) whilst undertaking RAYNET duties, even though there seems an unwritten understanding that OFCOM would most likely not take action against someone under this clause in relation to RAYNET operations.