

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:

Whilst I respect Ofcom's right to amend the licence terms as necessary (hopefully taking proper account of input received during this consultation process), I would suggest that there might be some benefit from exposing the draft text for any amendment to further peer review prior to finalising the changes - just in case the attempts to improve things fall slightly short of what is intended. What we have now works, in broad terms - it would be a shame to put something new in place that was not at least as good.

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 this should be in exactly the same way as other bands to which amateurs have access on a Secondary basis. The existing standard wording applicable to other amateur bands should suffice i.e:
"Secondary. Available on the basis of non-interference to other services inside and outside the UK"

In addition, I am concerned that some of the proposed clauses set worrying precedents that if subsequently applied to other bands would radically change specific aspects of amateur radio in the UK. In particular, I do not agree with your proposal for Paragraph 2.26.6, which should be deleted entirely, along with the phrase 'electronic equipment' in 2.26.3.

With respect to Paragraph 2.26.6, it is my understanding that near-field measurements at these frequencies are very difficult to determine with any accuracy; further they are irrelevant at the power levels in use. Clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not need to be reinforced in relation to the 472kHz entry.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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 - Not as proposed.

I feel that it would be better to retain a clear definition of requirements for call sign usage, and in particular, I feel that the current maximum interval of 15-minutes should be retained, as it avoids any variability in interpretation of the suggested "as frequently as practicable".

I have no problem with the requirements that a station must be clearly identifiable at all times and that the identity be given in a format consistent with the modulation in use. However, specific terms such as voice or Morse Code should not be used.

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 - I strongly disagree with this element of your proposal.

The current approach is widely accepted and understood - not only in the UK, but internationally. Any change in the way we use RSLs will lead to confusion and disruption,

both nationally and internationally. Changing the approach on this matter would do away with more than 50 years of accepted practice, which is widely understood throughout the world, and would create far more confusion than is currently alleged to exist.

If there is confusion on this topic, you should, perhaps, look into the causes - in my view this does not lie within the amateur community, and may stem from your own approach to including RSLs as part of the main station address callsign when issuing the licence documentation. You might consider issuing ALL licences without such an identifier - and leave it for the operator to insert, as appropriate.

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 by retaining the current clause in respect of the callsign 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?:

Yes.

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

Yes.