

**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?:**

Agree with proposal to include these bands but 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. The 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"

Furthermore some of the proposed clauses set concerning precedents that if subsequently applied to other bands would radically change specific aspects of amateur radio in the UK. Of particular concern is Paragraph 2.26.6, which should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3 Otherwise you are giving precedence to anyone who may buy cheap Chinese junk.

With respect to Paragraph 2.26.6, near-field measurements at these frequencies are very difficult to determine with any accuracy and in any case 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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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 - our licence holder left the club and it was extremely difficult for us to get it back

**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?:**

Yes. While operating from home station or generally mobile the 15 minute rule should remain but more as a guidance rather than strictly 15 mins, In some circumstances 20 mins may be reasonable. In Raynet operations in a large event covering many square miles - check point identifiers are more important and under pressure of incidents, 15-20min may not be possible

**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 practice. Any change of current practice will lead to both confusion and disruption both within the UK and around the world. Living in Northern England we see no issue with the many amateurs who regularly cross the border. We have been doing this for more than 50 years. It is understood by amateurs all over the world and would create far more confusion than is currently alleged to exist

**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 signs should vary their RSL as they currently do to indicate the country in which the station is operating

**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 provided the RSLs still indicate the country where the station is operating

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

Yes - On several occasions i have needed to communicate directly with MRT and Police in Raynet exercises, Sometimes there is a need to communicate directly with and event organiser/manager and trying do do this via 3rd party is ineffective