

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:

Why am I required to choose a title/honorific? I would like the option of not using one.

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 in the format proposed. The additional interference clauses are inappropriate. They are not necessary and should not become a general part of licence conditions. The existing licence provisions relating to interference and field strengths are appropriate and adequate. The stricter conditions are relevant in the case of high power SRPs, especially at UHF where high antenna gain is possible. The conditions should be restricted to those situations.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

No. The process for revalidation is simple and unambiguous. Regardless of actual practice, Ofcom should not be obliged to expend time, effort and money in dealing with lapsed licences.

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?:

No comment

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 existing requirements are easily understood and achieve the required aims. 'As often as is practicable' is a vague term which could easily be interpreted as meaning 'every 10 seconds'. It does nothing to improve or clarify the licence conditions.

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?:

In holding a licence for over 40 years I have never met anyone who is confused about the use of RSLs and I am at a loss to understand the basis for 'uncertainty'. The RSL reflects the location of the station at the time, what could be simpler? Amateur radio worldwide works on this basis; to change it would create chaos across a wide range of activities and undermine expectations built up over many decades. The proposal shows a total lack of understanding of the UK's amateur community.

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?:

If the correct response is applied in respect of Q7, this becomes moot. Otherwise it just highlights the stupidity of the proposal.

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?:

No comment

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

No comment