

**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?:**

No - 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

With respect to Paragraph 2.26.6, near-field measurements are irrelevant at the power levels in use. Clause (e) in Notes to Schedule1 of the existing licence is sufficient .

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**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

Not as proposed. The current requirements are simple and practical. The term as frequently as practical could be interpreted to mean every transmission, which is unnecessary. The 15 minute maximum interval should be retained (or reduced to 10 minutes).  
The station ID should be in the format consistent with the modulation in use - no need to mention voice or any other mode such as morse.

**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?:**

Not as proposed.

I believe that a station should have a unique callsign with RSL based on the main station address. If the licensee relocates to a different region then the station callsign should change accordingly.

If the licensee operates from a different region to the main station address then a prefix should be used identifying the region in the same manner as when operating from a different country. e.g. MM/M0WID if I were operating from Scotland.

My proposed change would however create some confusion in the rest of the world for short time, and the resulting prefixed callsign is rather clumsy, however there is no potential for misunderstanding.

Retaining the existing system which is widely understood around the world is preferable to the proposed change.

**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. All callsigns should be treated in the same way. This change is unnecessary if the existing system is retained.

**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