

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 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circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

I do not have a view on this question one way or the other as I do not represent a club.

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'?:

No. The definition of a disqualified person clearly links back to clause 4 and I do not think it would add anything to the definition or to the provisions of clause 4 if a further ground, as proposed above, was added.

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, but provided that the amended wording below in brackets is added : "Ofcom may revoke this Licence five years after the later of (but provided that they have first notified the licensee of the intention to revoke and have given him/her not less than 14 days to reply in writing) : " The reason I suggest this is that many licensees, for whatever reason, may forget to renew and need a reminder. We all have busy lives and schedules!

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?:

There should be consistency of approach, 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. The current provision for identification every 15 minutes (max) is far more certain and less open to either abuse or interpretation than an open ended requirement to be identifiable at all times would be. A clear definition of call sign usage and the current maximum interval of 15-minutes should therefore be retained. A station must still be clearly identifiable at all times and the identity be given in a format consistent with the modulation in use. Specific terms such as voice or morse code are, however, inappropriate.

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. Where is the uncertainty in clause 2(2)? It appears perfectly clear to me. It says the regional RSL needs to be added after the UK call sign prefix. There is nothing uncertain about that in my view. Clause 2(2) should be retained in its current format. The RSL is of

considerable use to stations contacted as it enables them instantly to know where the station with the RSL is. This is vital information for many awards and programmes, and in the heat of a contest vital seconds could be lost if the RSL station then needs to say separately where he is. That would be totally contrary to the spirit of the currently long accepted licensing regimes and accepted practices around the world, and the current clause in respect of the call sign prefixes should be retained . I seriously urge you to rethink this one and leave well alone - also, what is behind this proposal? Is this really the solution to whatever problem has arisen here?

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 call sign prefix. The current provisions of clause 2(2) ensure that the location of a station can instantly be identified, which is of far more use and benefit to the station at the other end of a contact than a reference to the main station address would be. It is the country where the amateur is located that is important in most contacts, not the main station address (where that is different). Also, there is already enough confusion among foreign amateurs about the UK licensing arrangements without adding a further conflicting stipulation.

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?:

I can see some benefits in this but I don't think the existing provisions are that unclear. So, in essence, no I do not agree to this proposal.

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

I don't think the proposals thus far will assist Raynet's position. An amendment to clauses 1(2) and 1(3) to add Raynet operation specifically in addition to the reference to the user services would add clarification.