

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. Whilst I am in agreement that these bands should be made available to all full licencees, I am concerned that the restrictions already in place with respect to the use of these bands will then be applied to the other existing bands (which do not have such (restrictions). Therefore I think that these two bands should be made available on a secondary basis under the understanding that amateur radio usage does not cause notable interference to the primary users of these frequencies.

I am also concerned that if the restrictions applicable to the 470kHz and 5MHz bands were to be applied across the board to other amateur radio frequency allocations that such an application would completely change the format of UK amateur radio.

I believe that paragraph 2.26.6 should be entirely omitted and also the term 'electronic equipment' in paragraph 2.26.3, since this term will cover a multitude of items which could be expanded at any time in the future.

With respect to near field measurements as outlined in paragraph 2.26.2, at frequencies in the vicinity of 500kHz the boundary between the near and far fields is far from easy to define, which will result in any measurements being conducted to suffer from considerable uncertainty as to their accuracy. Here, I consider that the Notes to Schedule 1 - in particular Clause (e) - are sufficient and so do not require further definition.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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, I accept this as proposed (being the holder of 2 club callsigns in addition to my personal callsign)

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, I accept this as proposed. This should help to prevent a 'disqualified person' from retaining 'control' of a club callsign.

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, I accept this as proposed. Removal of the word 'automatically' will then enable a person who has unintentionally failed to revalidate his/her licence (forgetting the time limit, for example) to revalidate the licence much more easily.

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, I accept this as proposed.

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.

The term 'as frequently as is practical' is insufficiently definitive. The currently accepted 'maximum of 15 minutes' definition is well understood by the amateur radio fraternity, so why change it?

Modulation modes are continually developing and some of these modes are not readily 'decodable' by someone monitoring the frequency and not being aware of the modulation method details. Therefore I consider that the transmitting station's identity should be in a format that can be readily understood by the person monitoring the frequency, but I consider that naming a definitive modulation method in which that identity is transmitted is undesirable.

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 do not consider that the removal of this clause is a practical solution, since such a removal will introduce confusion worldwide to amateur radio operators. The current arrangement of identifying the region in which a transmission is made is well understood. My own (G4) callsign means that I am transmitting within England and if I go on holiday to (say) Jersey and transmit from that location then changing my callsign to GJ4 tells the listener where I am. This arrangement has worked well for myself, so why change it?

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 with this proposal - I believe we should keep the callsign prefix in the same format for all classes of licensee, and in the same format as is currently in use.

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, I agree

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

Yes, I agree.

As an active member of Mid Herts RAYNET I am pleased for further clarification of what 'I can do' within the terms of my licence.