

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?:

Yes, however it should be in line with all other bands addressed on the licence and not place inequitable conditions on the bands that would not be expected on other bands (without justification) and that would be substantially different from the current NOV requirements

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

I suggest that the amendment should only apply to full licence holders, on bands where amateurs have primary status, and should be worded in such a way as to ensure that if required a station can be identified. I would suggest that a station still needs to give it's identification on change of frequency or mode at a minimum, and potentially at when finishing a conversation (not individual overs). Unfortunately while most amateurs are responsible and will continue to ensure their stations are clearly identified, there are those that will abuse the rules.

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?:

Yes, for full licencees only. See answer to Q8.

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. An intermediate licensee has already shown a willingness to learn and grow within amateur radio, and in such it makes no sense to subject them to more restriction than a foundation licensee. I would propose that the removal of the RSL applied either to none (with a review of how the Intermediate licensees are identified), or to restrict the removal of RSL to Full licensees only.

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, however the fact that the question has been raised about Clause 10(3), clearly the uncertainty remains and should be implicitly clarified.