

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:

A general overall impression is that some of these proposals are to change the Licence conditions because of errors or omissions in the past by Ofcom in issuing licence paperwork. My opinion is such changes to a legal document affecting all Radio Amateurs is unjustified. Instead the root cause needs fixing and any ambiguity or errors on the individual licence paperwork should instead be corrected or clarified.

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 Licensees 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

For example it is hard to see how causing so called "interference" to a device not designed to receive radio signals can ever be made the responsibility of the transmitting station in Law. For example in the past I have suffered complaints of misbehaviour of a lighting dimmer switch when I make shortwave transmissions. If the Amateur Radio licence is to be proscriptive in such cases then that seems a major change in the intent and scope of such a

licence.

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?:

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'?:

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?:

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?:

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. A clear definition of callsign usage and the current maximum interval of 15-minutes should be retained. However the requirements that a station must be clearly identifiable at all times and that the identity be given in a format consistent with the modulation in use are supported (but that specific terms such as voice or Morse Code should not be used).

The proposal is so vague as to be potentially far more restrictive than the current situation. At least as it is I know exactly what the minimum requirements for identification are. A term like 'as frequently as practicable' seems to imply at every possible opportunity which I'm sure is not the intent.

As someone who is very active in software development for new weak signal operating modes I am disappointed that extra weight is added by the use of "Voice" and "Morse Code" with some implication that they are preferred modes for identification when not using them as the main mode of communication.

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 - there is no need to change current mandated and widely accepted practice. Any change of current practice will lead to both confusion and disruption both nationally and internationally. To do otherwise would do away with more than 50 years of practice, widely understood throughout the world and would create far more confusion than is currently alleged to exist

The only uncertainty seems to be in the licence paperwork issued to some individual Amateur Radio licencees by Ofcom. Surely that is what needs clarifying rather than any change to the Licence conditions for all licencees.

The justification given for a mobile station operating while crossing a boundary several times in a journey is by definition an edge case and of little relevance since the actual location is so close to being correct if they make a mistake that it is insignificant. I do not see why such a long standing, well understood and, codified in International Amateur awards and competitions usage be abandoned on this basis.

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 callsign prefix

My answer to Q7 is equally appropriate here too.

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?:

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