

**Representing:**

Self

**Organisation (if applicable):**

**What additional details do you want to keep confidential?:**

Keep part of the response confidential

**If you want part of your response kept confidential, which parts?:**

Name

**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

Additional bands should be made available in the same way as other bands to which amateurs currently have access. i.e Secondary basis - Available on the basis of non-interference to other services.

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. i.e. The phrase 'or electronic equipment' in 2.26.3 should be removed and paragraph 2.26.6 should be omitted entirely.

With respect to paragraph 2.26.6, near-field measurements at these low frequencies are very difficult to determine accurately and would be irrelevant at the power levels in use. Clause (e) in Notes to Schedule1 of the existing licence should provide sufficient cover for 472kHz usage.

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**circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**

Agreed.

**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':**

Agreed.

**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?:**

Agreed.

**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?:**

Agreed.

**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?:**

Agreed although specific references to voice or morse code should simply be replaced with "a format consistent with the modulation in use" and left to the operator to decide.

**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?:**

Agreed, although the outcome must standardise the approach that will be used going forward. I am not overly concerned with the historical implications of this change as long as it simplifies the approach.

**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?:**

Disagree - All call sign classes should be treated in exactly the same way and should apply to the location of the main station.

**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?:**

Agreed.

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

Agreed.