

**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 so could be difficult to enforce and in any event seem irrelevant at the power levels in use in the UK. Clause (e) in Notes to Schedule1 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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**

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?:**

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. It seems unnecessary to use specific terms such as voice or Morse Code within the context of this point.

**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 see no need to change current widely accepted practice. Any change will lead to both confusion and disruption both nationally and internationally. Present practise has been in place for more than 50 years and is widely understood throughout the world.

**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?:**

All call sign classes should be treated in the same way by retaining the current clause in respect of the call sign prefix but I understand then the problem of intermediate call signs has arisen due to the issue of call signs that have a regional locator embedded within it. A two letter combination that includes a RSL and a main station country locator may be one practical way to overcome the difficulty.

**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?:**

Not being involved with Raynet I have no opinion on this.