

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:

As mentioned in questions 9 and 10 I believe this consultation should also look at talkthrough vs remote operation and what defines unsupervised use in 10.3. Likewise APRS and digipeating also needs clarification

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, but not as specified in the consultation. I think it should be specified as per access to other bands excluding the EMC and exposure to RF comments

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

I would consider the option in paragraph 2.45 a preferable option. I would suggest a license holders ability to hold a license is reviewed and they are required to undertake an additional

exam at the level they hold their license following any WT Act conviction. Additional text could be added to support that

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 - this should reflect the actual process followed. I would also suggest some clarification of what happens to a revoked license - e.g. can it be reactivated when a license holder gets back in contact? It would be useful to have a licensee check on the website where you could see the status of a callsign (but no other details) so amateurs could self monitor the use of revoked licenses

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?:

Yes - This makes a lot of sense. It is especially appropriate for situations where a tactical call sign is used and allows for more flexibility. The convention seems to be that every 15 minutes will remain but it reduces the need for enforcement in situations where the station in use is clear

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 - this makes things much simpler for new amateurs as it allows for a single call sign to identify a station wherever they are operating. It also makes it easier for others abroad to find callsign holder details on the callsign databases

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?:

I think for clarity, intermediate and full/foundation licenses should follow the same pattern. This may mean introducing a new callsign for intermediate license holders. It will cause confusion if a callsign changes when the main station moves address (e.g. moving house) or if someone chooses to only operate mobile

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?:

Paragraph 2.83 is unclear - I don't see how a club would need to transmit in multiple locations under the same call sign for radio direction finding that is not covered under unattended or remote operation which appear to be permitted. If direction finding transmitters are transmitting in multiple locations, individual rather than club callsigns can be used. However, there is a need for amateurs to operate unattended beacons (e.g. for WSPR propagation testing) .

I also believe the principle of remote operation needs clarified. In the USA for instance, talk through is expressly allowed and I see no problem setting up a receiver to provide a temporary cross band repeat under the remote operation definition either for one or a small group of license holders. A situation where this arises may include hillwalking for instance where HT sets are used to communicate to a car and then onto a HF channel to provide range to other party members. It is not clear what the requirements are for remote operation over radio link versus a cross band repeater.

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

Agreed to the changes

As per the comments to question 9, I think 10.3 needs clarified to define what is unsupervised use and what measures need to be taken to ensure it is not for general open use as a repeater. E.g. if I setup a cross band repeat with CTCSS code access, and didn't publish the CTCSS details, is that ok? If I then invite three other amateurs to the local park with me and share those details so we could all use the facility (but I am supervising their use as I am with them) is that then ok? Likewise I believe there has been discussion of APRS and digipeating for RAYNET and others which should be clarified under the license