

**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:**

I agree with the RSGB responses and I have detailed these below, I do not agree to more bands being restricted to FULL license holder only, the restriction of operation power and propriety black box equipment should be enough of a restriction for Novices and intermediates

It is quite difficult enough for novices and intermediate to operate, when full licenses holders who do not respond to CQ calls or purposely abuse / jam our or legal and lawful operations. It would be nice to see OFCOM add verbiage to the licence, protecting new operators and the implication to the nuisance FULL licence operators, ie life time ban from holding a licence if proven to have committed this sort of offence.

**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?:**

I disagree with OFCOM. I Agree with the RSGB response, which I have copied below and does not cause confusion to my response.

'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 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?:**

I agree.

This makes sense to keep the club's call sign with the club and any misuse by an elected club member should of course revoke his personnel licence as well as removing that individual as a user of said club's call sign.

**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 Agree.

**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?:**

I disagree, my reason is that there should be a statement that says attempts to prompt the licensees to renew / revalidate their license, and there is always a reason some individuals forget, the offender should get notification of failure to renew for the official body, before being removed.

**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?:**

I agree.

**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 disagree with OFCOM. I Agree with the RSGB response, which I have copied below and does not cause confusion to my response.

'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).'

**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?:**

I disagree with OFCOM. I Agree with the RSGB response, which I have copied below and does not cause confusion to my response.

'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'

**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 disagree with OFCOM. I Agree with the RSGB response, which I have copied below and does not cause confusion to my response.

'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'

**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?:**

I agree. To simplify the licenses details is a way forwards, as long as it is to simplify and not bring changes in by stealth, which has been the way of other organisation.

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

I agree as long as the changes are to clarify RAYNETS operations and does not include changes and restrictions.