

**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 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  
I am also concerned that some of the proposed clauses could set concerning precedents that if subsequently applied to other bands would radically change specific aspects of amateur radio in the UK. I feel that Paragraph 2.26.6, should be omitted entirely, as well as the phrase electronic equipment in 2.26.3.  
The near field measurements mentioned in Paragraph 2.26.6, would be very difficult to determine with any accuracy at these frequencies and in any case are irrelevant at the power levels in use. Clause (e) in Notes to Schedule1 of the existing license is sufficient and does not need to be reinforced in relation to 472kHz.

**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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**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 I agree this would be a good rule change

**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 I agree this would be a good rule change

**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 I agree the wording should be changed

**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 I agree the wording should be changed

**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. I suggest that a clear definition of call sign usage and the current maximum interval of 15-minutes should be retained.

**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. The present practice has been used for over 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?:**

No I disagree; All call sign classes should be treated in the same way by retaining the current clause in respect of the call sign 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?:**

Yes I agree with the proposal

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

Yes I agree with the proposal