

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?:

Disagree. The NoV process is swift and simple. It also means that anyone looking to get onto these bands - I speak from 60m background - has understood how they work. I have a fear that if the 'specialization' of 5MHz becomes open domain, people will 'wander onto' to the bands and have a play, and potentially end up splattering, much to annoyance of Prime User - and that does not help our cause for a worldwide continuous band at this frequency. Until we do get this, I believe the NoV should remain.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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 that this should be the case. Even a very simple request to change the holder of a club call-sign from one person to another, where both parties are in full agreement to the move is overly complex. It currently requires endless form filling, an authorising letter from the current holder and a £20 handling fee

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 also agree that this should be the case, club callsigns should NOT be abused by individuals who have left or been suspended for clubs

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?:

Failure to revalidate a licence every 5 years should result in the licence being revoked. This would also help remove licences from those no longer using them.

The fact that a licence can be revalidated at any time and not just at the 5 year mark removed the excuse from people that have issues getting on the site or contacting Ofcom.

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, this needs to be done

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 (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?:

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?:

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?:

yes, i agree that this would be a good idea, the term 'At Sea' is antiquated and should be replaced with either /MM or /M as required.

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

I'm not a member of Raynet, but i don't see any problem with encrypted messages being passed to a User Service if the user service requires it.