

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 would suggest that closer liaison with the national society would be of advantage to all parties. Simplifying Ofcoms essential work while giving a positive and structured feedback from UK licensees.

I write as a licensed Radio Amateur in several different jurisdictions , having held a license for over 30 years

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 in the form suggested but as it is proposed as a secondary user then in the same way as other Amateur Bands (ie "Secondary. Available on the basis of non-interference to other services inside and outside the UK"

Additional clauses are being introduced which are undesirable viz, f Paragraph 2.26.6, which should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:

Possibly. This seems an unnecessary change.

It is possible that this would have the counter effect of preventing both mergers and changes in club structure. OFCOM should remain neutral in this matter.

Better would be to offer the option of either Personal Representative holders or a Club holding. Many clubs might be too informally organised for OFCOM's purposes

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'?:

No comment

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 would not stop the procedure, but would leave some flexibility for special cases. However it could leave authorities open to complex legal challenges, if the sanction was not automatically.

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?:

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?:

Not in the form suggested.

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 I do not believe this would be a feasible solution to a non-problem.. Present good practice is widely understood inside and outside the UK. Changes would cause far more uncertainty and confusion than the minor amount present now.

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 callsigns should be treated in a similar fashion so as to encourage equality and progress in qualification. The UK (even with Scotland) does not compare in size with the USA where a regional basis is in use

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, the conditions as current could be consolidated

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

I am not a RAYNET user and have no observations to make