

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?:

I agree in principle.

But, for the purpose of licence understanding, why can the terms attached not be exactly the same as for all other frequencies which full licensees are entrusted with where the allocation is secondary use of the frequencies?

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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

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 in full with this proposal, and would add that the proposal is only common sense.

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 with this.

The wording should reflect what will actually happen.

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?:

Which document is 'the law'.

I agree that the licence and conditions booklet should match, but should it be the licence that is being changed to match the guidance, or should it be the guidance should be written to match the licence?

But, since the intention seems to be to harmonise across many different licences, it seems sensible on this occasion to alter the licence wording.

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?:

This proposal has caused much discussion at Halifax and District ARS.

My personal feeling is that stations should be clearly identifiable, and that such identification cannot be obtained by a 'one size fits all approach'.

In some circumstances the '15 minute rule' is insufficient, and more frequent callsign transmission could be desirable.

In one particular circumstance, that of the GB2RS news broadcast, a fifteen minute repeat of the callsign is not absolutely necessary, since the 'broadcast' times are published, and the frequency is regular and known. Therefore, if I were to tune to that frequency I would know for example at my location that between 9.30 am and 10am on a Sunday I would find GB2RS on 145.525Mhz. Why do I need the newsreader to tell me this is GB2RS at 9.45am? If I really want to know who the actual reader is, this is given at the start and end of the script anyway.

But, in all other circumstances 15 minutes is an absolute minimum for giving the callsign.

I support the notion that the same mode as being transmitted should 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?:

The very consultation has caused a degree of confusion to me.

My understanding was that being an England based amateur, my current call is M0. If I go to Wales I must change that call to MW0. What is difficult to understand in that.

If we make such a change optional, or not needed, this will cause further confusion.

The only time this would be easier would be if I were mobile and travelling along the Welsh border, where the roads have you crossing back and forth over the border.

But, essentially, why do we need to change established practice that is pretty well understood by all?

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?:

The understanding I have gained from the consultation is that Ofcom have found an error in the licensing system in that some licences have been issued as say 2E0ABC. The licence is a legal document, and a licence so issued legally surely has the callsign 2E0ABC, and thus when visiting Wales the licensee would not have a licence that showed 2W0ABC.

The cause is not a licence problem, but an administrative problem within Ofcom. Should Ofcom therefore fix the error, rather than making the rules fit the erroneous system?

If this proposal were to be implemented without the suggested changes to the Foundation and Full licensees we would end up with a disjointed system.

It is required of a licensee to be clearly identifiable, and locatable, unless I have misread the licence. Thus, for an intermediate from say Guernsey to sign as 2U0ABC in Scotland would misrepresent his true location, and not help him to fulfil his obligations as per the licence terms.

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?:

In principle I agree with the proposal. The proposal simply seems to be to clarify the licence terms.

But, I would like to see a full definition of 'maritime mobile' Current opinions differ as to what this means. Some amateurs state 'at sea' and 'maritime mobile' as anywhere in tidal waters. But, tidal waters include the Norfolk Broads system, the Thames etc.

As a full licensee it makes little difference to myself, but Foundation and Intermediate

licensees could inadvertently operate outside their licence terms if on a boat on a tidal river, if tidal waters are indeed maritime mobile.

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

In essence yes.

On a RAYNET event, if an operator had the unfortunate task of transmitting a message that indicated a medical emergency, this could result in a flock of 'ghouls' attending the scene to rubberneck.

On the other hand, if the operator was permitted to pass a pre-determined code to the control station, this could be avoided.

As far as communicating with non-amateurs. Essentially I cannot see a problem with this, BUT, specific circumstances need to be laid down as to when and how this would be permitted (e.g. does the non-amateur need to be supervised by a licensee?)