

**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?:**

Yes in respect of the proposal to include, as a matter of course, the 470 kHz and 5 MHz bands for all Full) Licencees. However, I see no reason for the inclusion of wording concerning risks associated with exposure to RF radiation (para 2.26.6) as near field measurements at the 470 kHz frequency are difficult to make. With respect to para 2.26.3, the reference to electronic equipment which implies 'non-radio' equipment is unnecessary and sets a precedence as such wording has not been included in the licence schedule previously and is at variance with Ofcom's normal practice in not investigating interference to non-radio related electronic equipment.

**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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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. The proposed rationale for ensuring continuation of a Club callsign when the individual holding the callsign is no longer associated with the Club is a welcome improvement over the current system.

**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.

**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.

**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. But the provisions of section 12 of the (WT) Act should be brought to the attention of the Licencee somewhere in the Licence document.

**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. The current 15 minute interval serves a useful purpose and should be retained. This being so, I see no reason therefore to treat the 5 MHz band differently to others. The mode of identification should be consistent with that in use at the time. Thus there is no reason to include terms such as voice, morse code etc.

**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. It is the wording of Clause 2(2) that is confusing and should be amended to make it unambiguous in its requirement. My view is that all licences should be issued without a RSL and that Clause 2(2) be amended to make it mandatory to use the appropriate RSL depending on the location of the transmitting station at the time. Thus the use of the appropriate regional RSL becomes mandatory and not optional. The proposed changes would lead to even more confusion than is currently (alleged) to be the case not only amongst UK Licencees but throughout the wider international amateur radio fraternity.

**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. This is discriminatory. The same arguments apply to this proposal as in Q7.

**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?:**

Possibly but the actual wording of the new Clause would need to be seen before making a considered judgement.

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

No comment.