

**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 - but with modifications.

The bands should be made available to full licensees but on the standard, Secondary basis.

The phrase "electronic equipment" in Paragraph 2.26.3 is extremely wide and should be deleted. If Ofcom have a particular meaning in mind for this band, they should set it down more precisely. The danger for amateurs is that such a wide term may migrate to other bands in the Schedule. Interference to non radio equipment is not something that licence has specifically embraced previously.

The proposed requirements for Health and Safety in Paragraph 2.26.6 would seem unnecessary at the permitted power levels and is, in any event, covered by other clauses in the current licence. It should be omitted.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**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

**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.

**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.

**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.

**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 drafted.

If Ofcom are proposing to replace Clauses (a), (c) and (e) in Paragraph 13 with "a station must be clearly identifiable at all times", Clause (b) with "a valid call sign for the station be transmitted as frequently as is practicable during transmissions to ensure that the station is clearly identified" and Clause (d) with "the station's identity be given in voice, Morse Code or a format consistent with the modulation in use", then it is not clear that the original meaning has been maintained.

Perhaps Ofcom are trying to avoid some anomalies. Clause (a) will not be respected by repeaters, for example, and Clauses (c) and (e) by any modes which do, or in future will, transmit on more than one frequency. However, none of this is explained on

<http://stakeholders.ofcom.org.uk/binaries/consultations/amateur-radio-licence/summary/condoc.pdf>.

For me, the proposed replacement for Clause (b) with "as frequently as is practicable during transmissions, is much too vague and the current 15 minute provision is to be preferred.

As for the proposed replacement for Clause (d), it should be replaced with "the station's identity be given in a format consistent with the modulation in use". No explicit mention should be made to voice or Morse.

**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 disagree.

The use of RSLs to identify the current location (within a constituent part of the UK or Crown Dependency) of the station (rather than the main station address) has become common working practice for radio amateurs and I maintain that altering this arrangement would cause the most confusion of all (except possibly making the use of RSLs optional, which will spell the end of uniform practice).

I assume that, in licences that Ofcom has issued, this causes no potential duplication. For example, G4ABC and GW4ABC have not been issued as separate licences.

For me, the intention of Clause 2(2) is clear. Section 1 should specify the "stem" callsign (e.g. G4ABC, regardless of the main station address) and the RSL should be inserted after its prefix, be it G, M or 2, depending on where the station is currently operating. Otherwise, you could have two RSLs in use, the one in the licence and the one denoting the current operating location.

However, I don't know what the working practice of Ofcom has been in issuing licences.

The RSL should continue to be used to designate the constitutional part of the UK or Crown Dependency,

**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 licence classes should be treated the same way, having to transmit a call sign prefix indicating the location of the transmitter.

**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.

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

Yes - I agree.