

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?:

No - Not as proposed. I think full Licensees should have these bands added to their license, but in exactly the same way we have access to other bands on a secondary basis. Therefore the standard secondary usage wording should apply.

The phrase 'electronic equipment' in 2.26.3 should be removed as this is not applied to other bands and sets a dangerous precedent by including it for 470kHz band.

Para 2.26.6 should be omitted as this is not relevant for the power levels allowed on the band. Clause (e) in Notes to Schedule1 of the existing license is sufficient.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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?:

As a way to reflect what actually happens then yes. But I would add that with a 5 year revalidation period, for many it becomes hard to remember when it was last done, and so personally I do it every year. Therefore, whilst I appreciate it reduces the admin overhead, if the intent is to maintain valid records then why not reduce the period to annually. The revalidation date could then be set to something memorable ie 1st Jan or the licensee's birthday, with the ability to revalidate up to a month before in much the same way as MOTs

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

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 proposal makes reference to the station being identifiable at all times " and the call sign to be transmitted as frequently as is practicable" This leads to greater ambiguity as to what constitutes "identifiable at all times", and how often should the call sign be given. The existing clause 13 remains fit for purpose, and covers the requirements in section 2.27 and should be enforced to.

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 don't believe there is confusion about the use of RSI's. These are widely understood and nationally and internationally recognized. Changing them would cause considerable disruption.

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, see response to question 7. Intermediate licensees should not be treated any different to other licensees, and should therefore use the existing clause regarding prefixes.

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 this appears sensible.

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

Yes, provided it is made clear that any encryption is to be performed by the emergency services and that they are responsible for its effectiveness. Further it should be made clear that the licensee involved in these transmissions will not be liable if the encoded message is intercepted and decoded by an unintended recipient.