

**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 agree that the bands should be made available to all Full Licencees but in exactly the same manner as as on other bsnds to which amateurs have access on a secondary basis. The existing standard wording applicable to other amateur bands should suffice i.e. " Secondary. Available on the basis of non-interference to other services inside and outside the UK"

Some of your proposed clauses set concerning precedents that if subsequently applied to other bands would radically change specific aspects of amateur radio in the UK. Paragraph 2.26.6 should be ommitted entirely as well as the phrase 'electronic equipment' in Para 2.26.3

With regard to near-field measurements at these frequencies Clause (e) in Notes to Schedule 1 of the existing licence is sufficient for the power levels in use and does not need to be reinforced in relation to the 472kHz entry.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**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

I do 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?:**

I do not agree. The existing wording in the licence is simple and adequate and does not need changing.

**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?:**

Do not agree as proposed. A clear definition of callsign usage and the current maximum interval of 15 minutes should be retained. The station must be clearly identifiable at all times using a format consistent with the modulation method in use. It should not be specified by the terms voice or Morse Code as this could be too restrictive in the future.

**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 - there is no need to change current mandated and widely accepted practice. Any change of current practice will lead to both confusion and disruption both nationally and internationally. To do otherwise would do away with more than 50 years of practice, widely understood throughout the world and would create far more confusion than is currently alleged to exist.

**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. All call sign classes should be treated the same by retaining the current clause in respect of the callsign prefix, otherwise confusion will develop followed by sloppy operating.

**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?:**

I agree.

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

I have no comments to make.