

**representing:**

Self

**Organisation (if applicable):**

UK Amateur Radio Station G4FUA

**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:**

I no longer believe that Ofcom have the best interests of UK Amateur Radio Operators or the RSGB as a primary focus; there is too much emphasis on SPECTRUM SELL-OFF!

**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 way as other bands to which amateurs have access on a Secondary basis. The 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"

Furthermore some of the proposed clauses set concerning precedents that if subsequently applied to other bands would radically change specific aspects of amateur radio in the UK. Of particular concern is Paragraph 2.26.6, which should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3

With respect to Paragraph 2.26.6, near-field measurements at these frequencies are very difficult to determine with any accuracy and in any case are irrelevant at the power levels in use. Clause (e) in Notes to Schedule 1 of the existing licence is sufficient 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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**

Yes, But there needs to be simple method of updating the particular Club Call-sign Licensee detail and validating their personal License

**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, In the light of the increasing spectrum abuse and call-sign pirating, the whole area of disqualification proceedings needs to be tightened. After all, spectrum abuse is still a crime - isn't it?

**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. There are many circumstances when a licensee cannot or does not re-validate their licence. I have friends who are 'senior citizens' who un-like me, are not keeping up with the times and don't really understand this 'revalidation business' (their words)

**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, let's have some consistency.

**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 proposed. A clear definition of call-sign usage and the current maximum interval of 15-minutes should be retained. However the requirements that a station must be clearly identifiable at all times and that the identity be given in a format consistent with the modulation in use are supported (but that specific terms such as voice or Morse Code should not be used).

This situation also impacts on repeaters using 'ONLY' CW-ID. We have new operators (and some older ones) who have no-idea what repeater they are using! They have to ask!

Take a leaf out of the GB3WR repeater - "Clear and concise Voice-ID using FM (the mode of operation)

**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 agree with RSGB Guidance on this matter.

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 I disagree - All call sign classes should be treated in the same way by retaining the current clause in respect of the call-sign prefix'

Also any thoughts on the removal of any geographic/national prefix is a NO-NO!

(I have heard this discussed by Ofcom representatives)

We are NOT a single COUNTRY, we are a UNION of COUNTRIES. (Hence the title UNITED KINGDOM)

The whole world of Amateur Radio Operators know this fact and seek to make contact with each separate country in the UK

ARE Ofcom proposing to set themselves above the STATE?

Remember Ofcom, you are an 'agency' of the UK Government! Not a Law Maker

**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 with the simplification: But there was (IS) still value in knowing that an operator is working from:

An Alternate location - suffix /A, and  
A Portable location - suffix /P

Why this had to be messed with beats me!

Both RSGB and Ofcom seem to have missed the point here.

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

Yes, I still believe that RAYNET is undervalued by both Ofcom and the Government; though recent local or regional disasters have brought them into the spotlight