

**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 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 Schedule1 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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**

I agree with this change so long as it is made clear that when a license is revoked in this manner the callsign remains reserved for the club to which it has its base allocation. Given

that many of these callsigns have historic and special significance it would be wholly wrong for them to be available for general reallocation .

**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??:**

Reasons for revocation should be written in plain English as to be very clear to all. They should not be wrapped up in a number of clauses, rather made very clear in one clause.

**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 am minded that most other data bases have the facility to send out a timely reminder by e-mail when a membership or similar becomes due to revalidation. The obvious one is the DVLA data base which automatically sends out reminders that vehicle excise duty is due. Ofcom should adopt a similar approach. One would suggest that as part of the revalidation process a valid e-mail address should be given and the duty on the amateur to keep this up to date at all times.. If a license holder fails to respond to the auto reminder within s set period of time it should be revoked. Any suggestion of charges should have reasonably have been defined within the consultation brief so that those participating could take a view rather than having to guess what that might be. Any charge should reflect the fact that this is an amateur service and not commercial where large revenue/profit is made from the operation.

**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?:**

In the interest of good governance both license and general conditions book should reflect the same information.

**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 callsign 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).

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

**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?:**

The operation of the station away from the main station address should have specific rules attached to it and these should be drawn up in clear and concise terms within the license. A suffix should be given with the callsign to demonstrate that the station is not being operated from the home location. There should also be clarification as to the requirements for station operation where the transmission equipment is located away from the home address in order to properly regulate those who wish to use remote operation of the transmitter where they will have no immediate control over it other than by an internet or other landline link.

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

As I have no involvement in RAYNET operations I chose not to take a view.