

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. Although the NoV is easy to apply for it seems to make sense to made it part of the full license possibly making it easier and more accessible. It may also make it more obvious to amateurs that they have access to these bands.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:

Agreed. Club callsigns should somehow remain the property of the club and appropriately licensed club representatives or officers.

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??:

Revocation should be used when clear and repeated breaking of license conditions occur but only after warnings and re-education have been implemented.

Of course additional enforcement efforts must also be made to detect cases that may lead to disqualification

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. Ofcom should also make the automated system more flexible and send license reminders to all holders in advance of license expiry dates.

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. For speech and some data modes 15 minutes is appropriate and should be used. For certain modes it may need to be longer so as not to impact data streams.

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?:

Yes. In an increasingly cosmopolitan and mobile society the use of regional secondary locators is another anachronism in a similar fashion to the optional /P, /A identifier.

Better to do away with it and the confusion it can cause.

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. Ofcom needs to propose a clear, simple solution to intermediate licensing and the confused 2E, 2M, 2W system currently in place.

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?:

No. Further clarification especially of 'airborne operation' is required.

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

Yes although an amateur needs to be assured they will not be prosecuted or punished for potential breach of their license conditions due to the nature of the transmission