

**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?:**

I agree in part. The 472kHz and 5 MHz bands should be incorporated in the full licence, but on the same terms as all other bands allocated on a secondary basis. Secondary access is available on the basis of non-interference to other services, and further restriction is unnecessary. In particular, the phrase "electronic equipment" in clause 2.26.3 is too onerous, as it would include interference to equipment such as washing machines and refrigerators, which makes no sense technically, and also to non- CE compliant equipment. Thus a loophole is being provided which will weaken attempts to minimize electromagnetic spectrum pollution which already rendering parts of the spectrum unusable.

Clause 2.26.6 is also unacceptable. At the low power levels authorised on 472kHz, radiation risks are negligible. The provisions of schedule 1 clause (e) of the existing licence are perfectly adequate in this respect. Further, the HPA does not exist.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**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

**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?:**

Yes.

**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. It is unclear what advantage would result from removing the requirement to transmit a callsign at least once in every 15 minutes. The existing provision should be retained to be consistent with the requirement that the station should be clearly identifiable at all times. However, the use of data modes in particular means that the requirement to use Morse Code or Speech for identification is no longer appropriate. This should be replaced by the requirement that the station should be identified in a format consistent with the modulation being 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 confusion inherent in the present system, and to change it after 50 years would create confusion where it did not previously exist. Stations are presently clearly identifiable with or without the RSL because no licences exist which rely on the RSL to be unique.

**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. There is no reason to treat intermediate licensees any differently from foundation and full licensee, given that no licences exist which rely on the RSL to be unique.

**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.

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

Yes.