

**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:**

Some of the proposed changes have not actually been thought through very well with regards to the wider, global community and the implications for all aspects of the hobby and how the UK fits in (or doesn't)

**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, I disagree with the proposed change.

Any additional band allocations should be constrained by the current license conditions i.e. only a schedule change.

If the provision of additional bands cannot be accommodated within the current license structure and conditions, then the bands are not actually suitable for general release and should be kept as NoVs only where consideration of the individuals use and needs are taken into account.

Alternatively !

Make the process an automated NoV by users logging into their OLC account and requesting the NoV INDIVIDUALLY which is generated automatically. In this case the NoV can contain the additional constraints and license requirements and apply them ONLY to the applicant.

The latter option would suit the needs of the individual as well as protecting the majority of license holders not using these bands as well as making this an automated process for Ofcom

by removing manual NoV administration. The requested NoV and auto generated response, would have a period of validity equal to the applicants main license

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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

The club call sign should not be the sole domain of the NoV holder although it be retained by an individual on behalf of the club.

Should, as often happens, clubs disband or the individual decides to leave the club and through a vindictive act refuses to release the club call sign to which members have been loyal, there should be some recourse.

The club call sign is effectively a "brand" name for which a club is recognized, it should therefore be treated as the property of the club.

If requested by the officials of a club, Ofcom should be empowered to simply remove the NoV entitlement from an individual who is wrongly retaining it and transfer the Nov to an alternate representative of the club as long as club entitlement and status can be established by the petitioner for the change.

All good and a very welcome change. Clubs can have invested heavily in the call and integrated it to their identity in many cases. Having no current provision to protect clubs from malicious individuals is an oversight long overdue for correction.

**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?:**

No

I firmly believe that any responsible person can re-validate their license at any time and it should be their sole responsibility to do so.

Just like a driver of a car should be responsible for the regulatory requirements and condition of their vehicle, radio operators assume responsibility for their equipment, transmissions AND license status

If any changes should be made to simplify the requirement and reduce the overhead of the process, the statements should simply be changed to

be revoked automatically and without notice to the licensee.

**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 !

The current requirements are at the core of the good operating practices used by UK operators.

The requirements have been taught at core level for so long now any changes would be completely detrimental and confusing for upcoming generations of operators, much like confusion between BR68 and current license is now.

No more confusion please, it is not broke, do not fix it.

The infuriating practice of listening on-air for a call sign given when they felt like it, is bad form and extremely irritating.

A fine example of bad practice and exactly what will happen if a generic and obtuse wording as proposed is used.

The current wording covers good operating practice, clear constraints on what is needed as well as already specifying ID to be given in the same modulation format as in use at the time.

The new wording is trying to do the same thing, it is just change for change sake, leave it as it is.

**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 !!! ABSOLUTELY NOT

The established use of the UK and dependencies use of the RSL is now so integrated on the world arena any changes would be completely negative.

The mis-issue of certain licenses by Ofcom does NOT exclude the licensee from correctly

following the use of RSL as contained in their license to identify which UK territory they are transmitting from.

Any change in this regard will not just confuse a few people short term, it will damage the world expectations permanently as well as discouraging the use of software applications, DXCC, award scheme providers etc for good.

The impact on EXISTING awards for DXCC users world wide should also not be overlooked.

As a DXCC entity it is not beyond the realms of possibility for the UK regions to be changed to simply one DXCC entity in the face of global complaints from award schemes, invalidating perhaps 5 DXCC entities from users of the DXCC scheme world wide as it will no longer be a rule for identification,

This would seriously disadvantage smaller regions such as GD/GJ/GU who almost stand out as DX contacts due to lack of active stations compared to GM/G/GW/GI

No changes thank you.

**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 and use of RSL should apply to all call signs regardless of license level.

Use of a coherent scheme as we have now is required for clarity of transmission location for any station and totally crucial to maintaining correct station ID on the air.

**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 and No

Club calls should be allowed to transmit from several locations at same time on condition they are authorised to do so by the NoV holder

No Holders of reciprocal licenses should NOT be allowed to operate abroad under the UK license but should use their original call if applicable.

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

Yes and No

Yes- absolutely RAYNET should be able to encrypt their transmissions where appropriate as release of incident data may not be appropriate to any listeners.

RAYNET operations should be able to apply

RAYNET should be allocated specific repeater frequencies to use for temporary exercises or operations as their BASE<>MAN relationships are often hindered critically by geographical obstacles.

I would also go so far as to say that only with RAYNET operations, the use of tethered balloon (elevated) repeaters should also be allowed. primarily as they are fast to deploy and lightweight enough for airlift deployment to wherever needed.

RAYNET operation tend to always be on unfriendly terrain, no account for this is provisioned and seriously hampers their ability to function communications wise when faced with interfacing quickly with MRT teams or user services

RAYNET should be given much more latitude