

**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 available to all Full Licensees but in exactly the same way as other bands to which amateurs have access on a Secondary basis, i.e. non-interference to other Services.

Para 2.26.3 is worded too broadly. The words "or electronic equipment" should be deleted.

**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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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. This will be of benefit to clubs, some of which have lost the use of historically important callsigns.

**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, in that I do not object to the wording being made more consistent, but I have to take it on trust when you say that you are not seeking to change the charges themselves.

**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 the callsign and a maximum interval of 15 minutes should be retained. The identity should be given in a format appropriate to the type of modulation in use. Specific terms such as Voice or Morse Code are then unnecessary.

**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 the current practice, which has stood the test of time and is understood worldwide. THE PROPOSED CHANGES WOULD CAUSE FAR MORE CONFUSION, BOTH IN THE UK AND INTERNATIONALLY.

The real confusion is at Ofcom and springs from a misunderstanding of "2" as an amateur radio PREFIX and equating it with G or M. Worldwide, all amateur prefixes have at least one letter and the majority have two. "2" is not a valid prefix unless a letter is attached, hence Ofcom's apparent need for Q8 below. The rest of the amateur radio world sees G or M as the PREFIX for England and GW or MW as the PREFIX for Wales. Viewed in this way the idea of a Regional Secondary Locator as a separate entity becomes redundant. If the licence had a list of Regional Prefixes to be used (based on current location) rather than a list of RSLs to be added to a prefix, the problem should disappear.

**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 callsign classes should be treated equally and the licence should be worded so that all licensees should use a prefix which reflects their current regional location.

The Ofcom database should hold calls in the form 2E0aaa etc, not as 20aaa which is not a valid amateur callsign format. The "E" is part of the Prefix, not something separate.

**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