#### epresenting:

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. The implications have not been thought through.

It's OK that the bands are made available to Full Licence holders, but just as for other bands which amateurs have access to on a Secondary basis. The blanket amendment of existing NoV clauses is not sensible or appropriate, and will lead to unwanted and undesirable consequences,

Why are their amendments which if extended to other bands will affect amateur generally, viz paras 2.26.3 and 2.26.6? In the former case, we have never been restricted to causing interfernce to "electronic equipment" before. In the latter case this is impractical for radio amareurs in the 470MHz band. Surely existing licence requirements cover this requirement?

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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 - not as proposed.

Specific terms such as 'Voice' or 'Morse Code' are not necessary. I agree that a radio amateur station must be clearly identifiable at all times; there should be a clear definition of how to do this, and at least every 15 minutes.

#### 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, definitely not. Why change the current mandated and widely used practice? It works, so please don't break it. Change would probably cause more confusion, not just nationally but also internationally.

# 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?:

I do not. This is discriminatory and not in keeping with the spirit of amateur radio. All call signs should be treated in the same way as detailed in the existing clause.

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?:

I'm afraid that I do not know enough about RAYNET operations to express a view, but as this is such a worthwhile capability, used in times of catastrophe, nothing should be dome to make their vital job more difficult.