

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?:

This seems an eminently sensible suggestion, I support it.
However, I do not concur with the re-wording of the secondary use basis.
The standard wording applicable to other amateur bands is entirely practical and sensible i.e:
“Secondary. Available on the basis of non-interference to other services inside and outside the UK

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:

This is a very poorly worded question, I would suggest that all it needs to say is
"The amateur radio call-sign allocated to a club shall remain issued to the named club. The licensee shall be a club member. If the licensee ceases to be a member it is incumbent upon the officers of the named club to assign another licensee to hold the licence.

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??:

No.

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?:

The word automatically is unnecessary, it is not being enacted currently and so should be deleted.

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?:

I feel that the current 15 minute rule is entirely reasonable. The only suggestion for change that I would submit for consideration would be to forbid the shortening, or abbreviating, of call-signs. One regularly hears this practice on 80 Metre nets.

An additional thought, it would be entirely reasonable in a net context to require each net member to properly identify at the end of each of their transmissions.

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?:

I feel that this clause needs no change in reality.

It may be that a station should always identify with their given home call eg G7ABC wherever they are operating from, but to add the current RSL as a suffix in exactly the same way that visiting EU amateurs do. EG G7ABC / GW or GU3ABC / GM

A French station F3ABC operating in Jersey is F3ABC / GJ.

This, I suggest, would be the simplest way forward - if there is an identified requirement for change.

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?:

With regard to intermediate licensees, I believe this is entirely reasonable.

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 feel all licensees should transmit a call sign that identifies the location of their main station, I further suggest the suffix protocol that I identified in my answer to question 6, whereas the current RSL pertaining to the country of operation should be appended to the callsign i.e.

2M0ABC / 2J (OR GJ or MJ)

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?:

I don't believe that the current clauses can lead to any ambiguity, that said the revision doesn't appear to disenfranchise anyone which is the key test of it's fairness.

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

I do not. I feel that Raynet operations should always be performed in the clear, unencrypted and unciphered. This may allow another person to receive them, but it will enhance to service to the user services because the integrity of the message can be confirmed by multiple recipients.