

**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:**

Thank you for the opportunity to comment on the proposed changes to the amateur license.

**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?:**

Not entirely. The 470kHz band is allocated to the amateur service and therefore should be included in the full license.

The 5 MHz band is not allocated to the amateur service. The original purpose of the allocation was for experimentation into NVIS communications and emergency communications. Treating it just like any other amateur band would make it become just more of the same and it would revert to DX collecting and nets. At least until a global amateur allocation is made it would be better to limit the band to those with a genuine interest in experimentation with NVIS through retaining the NOV and reintroducing the requirement to use the band for experimentation and discouraging its use for DX.

**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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**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 would solve many issues that arise from the current arrangements. In addition, it needs to be clear that a callsign is allocated to a club and held by the licensee on behalf of that club rather than owned by any individual amateur.

**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':**

I support this.

**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':**

I agree. Automatic revocation is too harsh, especially when the renewal is so infrequent. It is easy to forget. This also covers cases where unforeseen circumstances may result in an amateur missing the deadline.

**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 do not agree - the amateur service is considered a public good and even though it is not the intention of Ofcom to charge fees, that position could change. Any fees should be solely based on cost recovery. I would support wording to that effect.

**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':**

Yes. I agree with the Ofcom proposals here. I note the RSGB are proposing retaining the 15 minute maximum interval. I do not support this but I do believe some form of guidance should be given as to best practice.

**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':**

I support this. The most important issue here is satisfying the requirement given in 2.65 "that anyone (anywhere in the world) who hears the identity of the station must be able readily to identify the station." Current UK practice differs from that of other administrations.

A concern is that it will no longer be clear if a station is currently located in England, Wales, Scotland etc. This could be dealt with by a suffix as long as this does not obscure the station identification. It will then always be clear where their main station is located. It would be helpful for Ofcom to mandate what format should be used to identify location when away from the main station to avoid many different and confusing iterations.

**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?:**

Yes.

**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, though it is important to ensure that relaxations to enable Raynet operation, for example the ability to pass messages for non-amateurs are only applicable to genuine emergency use. Raynet should only be used as a supplement and not as a substitute for nominal event communications networks, e.g. PBR.