

**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:**

I am grateful to be given this opportunity to express my opinions, which are entirely my own, on the proposed changes to the Amateur Radio Licence. Having been a SWL and Full Licence holder for many years the views expressed in my answers to the 10 questions is based on the experience of being an active & enthusiastic amateur radio operator, most of the answers are condensed for space limitations but I hope I have expressed my opinions well enough to be considered valid and will be considered for the purposes of this consultation.

**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 Ofcom has currently proposed. I see no valid reason, given the special regulations applicable to these bands, that it is necessary that they are incorporated as a matter of course into the Full Amateur Licence. Given that the present system of NOV issue works very well, and an NOV may be applied for by those Full Licensees that are interested in these bands can easily apply for an NOV for the band of interest. This would preserve the special nature and terms and conditions for the use of these specific bands which are very clearly set out in the appropriate NOV.

Furthermore, some of the proposed clauses set very concerning precedents that if subsequently applied to other bands would radically change specific aspects of amateur radio in the UK. Of special concern is Paragraph 2.26.6, which should be omitted entirely, as well as the phrase "electronic equipment" in 2.26.3 which is wholly ambiguous as anything that is electrically powered by whatever method can be defined as "electronic equipment". With reference to Paragraph 2.26.6, near-field measurements at these frequencies are very difficult to determine with any accuracy, and in any case are irrelevant at the power levels in

use. Clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not need to be reinforced in relation to the 472 KHz entry.

**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, as described in paragraphs 2.32 - 2.41 of the consultation document.

**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, as described in paragraphs 2.42 - 2.49 of the consultation document.

**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, as described in paragraphs 2.50 - 2.54 of the consultation document.

**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, as described in paragraphs 2.55 - 2.58 of the consultation document.

**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 in paragraphs 2.59 - 2.63 of the consultation document. A clear definition of call sign usage and the current maximum interval of 15 minutes should be retained. However, the requirements that a station must be clearly identifiable at all times and that the identity be given in a format consistent with the modulation in use I definitely support. But, specific terms such as Voice or Morse Code should not be used.

**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 current mandated and widely accepted practice. Any change of the current practice will lead to both confusion and disruption both nationally and internationally. To do otherwise would do away with more than 50 years of practice, widely

understood throughout the world and would create far more confusion than is currently, alleged to exist. I personally have never experienced any confusion/misunderstanding of my callsign, or other callsigns used by fellow amateurs while participating in a net, nationally or 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?:**

No. I do not agree with the proposal. All callsign classes should be treated in the same way in this respect by retaining the current clause in respect of the callsign prefix.

**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. I agree with the proposed changes set out in paragraphs 2.81 - 2.92 of the consultation document. These proposed changes should clear up some ambiguous wording in the present documentation.

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

Yes. I agree with the proposed changes set out in paragraphs 2.93 - 2.100 of the consultation document. These proposed changes should clear up some grey areas in the wording of the present documentation. It will allow RAYNET operators greater flexibility to perform their duties as required by user services in an emergency.