

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.

The phrase 'electronic equipment' should be further defined or omitted from 2.26.3. This term is insufficiently specific. This has never been included in the licence schedule and is at variance with Ofcom's normal practice in not investigating interference to non-radio related equipment.

Paragraph 2.26.6 should be omitted entirely. Clause (e) in the Notes to Schedule1 at the end of Section 2 of the existing licence, is already sufficient in this regard.

It is welcome that the bands should be made available to all Full Licensees but for clarity and simplicity, they should be available in exactly the same way as other bands to which amateurs have access on a Secondary basis.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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

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 - The revocation of licenses from offending stations seems a change purely in legal wording, which should never affect the responsible licensed operator. It remains far more challenging to identify offenders and unlicensed stations in the first place.

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 and No - Subject to Ofcom sending advance notification, I have no problem with the current automatic revocation of licences that have not been renewed. This is however, only of benefit if there is a policy of re-issuing these unused call signs after a lengthy cooling off period. This would preclude the need for 'inventing' further series inevitably add a layer of complexity to the license numbering logic. I am very sure that there are enough unique G and M series identifiers to go around within the UK.

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 - The changing of the fee structure wording may be the thin end of a wedge. Nevertheless, I have no real objection to paying a small administration renewal fee every 5 years.

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 - This needs further clarification. It would appear to be fixing a problem that doesn't significantly exist. I'm not sure what the re-wording of the transmission of call sign requirement achieves, and strongly against the use of the very open phrase 'at all times'. Most amateur operators far exceed the current requirement. I'm not sure how it can be formally policed anyway.

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?:

Yes - There seems variance between Ofcom intention that the RSL should reflect the main station address whilst the RSGB appear to prescribe its use for the transmitting location. An update and clarification of the guidance would be useful to all.

In my very inexperienced opinion, a call sign should be just that: identifying the licensed station/amateur operator. When a location is useful, it would be better as a suffix to the call

sign rather than changing the early letters which makes identifying stations and sorting the radio log more tedious.

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 - I agree with the proposal to clarify the intermediate call sign situation and prescribe a mandatory second letter according to that station's main licensed address.

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 agree.

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

No comment due to lack of experience