

**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?:**

generally ok.

but the proposed copy and paste identified by rsgb should not be assumed to be appropriate method of amending the licence. better to amend each sentence with clarity of intention.

rsgb offers Secondary[ available on the basis of non-interference to any other services]

paragraph 2.26.3 wording "electronic equipment" be deleted as its is too vague and the equipment may be illegal , poorly designed and susceptible to interference from other electrical equipment ;just not amateur transmissions.

as rsgb points out to make measurements at the low frequency bands is difficult to quantify as has been shown in the long saga of internet superimposed on mains wiring at similar power levels.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**

perhaps there should be two club members with a prime and deputy to avoid revocation on the resignation (death) of one member. otherwise if both club members resign then its revocation until two new members are appointed.

if only one member is listed on the licence and he resigns the licence is revoked.

**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'?:**

agree.

**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: there will be many reasons why a person has failed to revalidate but that does not mean the person should be hindered from doing so by bureaucratic procedures

**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?:**

agree.

**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: the proposals are unclear. the current methods of identifying stations at 15 minute intervals work well from the operators point of view and its not broken and doesn't need fixing.

however if the proposed changes are instigated by a desire to identify more thoroughly those stations breaching regulations then they will still remain difficult to identify with the certainty required.

**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: the current uses of call signs is clearly understood by all operators on the air, even those being abstruse.

I had not realised the requirements clause 2(2) were a problem except perhaps operators with poor language abilities: and then why should they be operating rather technical equipment. it does not make sense that the existing clause needs amending!

**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: the current practices are working and don't need changing. the proposed changes will be seen as impeding amateur self training programmes and more consistency in call allocations is all that's required here.

**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?:**

agree: perhaps we shall "be at sea" if this not clarified

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

generally agree, but raynet operator responses should be noted.