

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. I agree that the bands should be made available to all Full Licensees, however this should be on the same basis as all other amateur radio bands that are available on a Secondary basis for which the current wording is adequate. Any conditions specific to these bands under the current NoV should be omitted entirely.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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 - agree as proposed.

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 - agree as proposed.

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 - agree as proposed.

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. The current wording is specific enough and should be retained. I think that a station should be identifiable in a reasonable time frame, and that identification should be made consistent with the modulation in use, and requirements stated in specific quantifiable terms. The proposed wording is less specific, open to interpretation, and potentially more onerous depending upon how that wording is interpreted. I do not understand why voice and morse code have been specifically identified and do not think this is appropriate wording.

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 - I do not agree with this proposal. The current practice is widely understood and accepted. I think that to change would lead to considerably more confusion worldwide than is currently claimed.

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 this proposal. The current clause in respect of the callsign prefix should be retained. All call sign classes should be treated in the same way with respect to the 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 - agree as proposed.

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

Yes - agree as proposed.