

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?:

The 470kHz and 5MHz bands should be included in all Full Licences without the need for a NoV, but the access should be on the same basis as all other bands to which Amateurs have access as the secondary service.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:

Not as described. The Full (Club) Licence should be attributed to the named Club regarded as a continuing body of members, regardless of which individual has personal responsibility as licence holder for the conduct of the Club's operations on-air. There should be a straightforward procedure for changing that named licence holder that does not involve "revoking" the licence. Obviously, individual officers of a Club come and go, but the continuity of the Club licence should be assured, unless, of course, the Club as a whole lapses into inactivity.

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

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. A second chance should be offered, with a period of grace to comply with the revalidation requirement.

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

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. Identification requirements should continue the established practice, but modern modulation methods should be recognised, e.g. the many possibilities for digital modes. The identification should be transmitted using the mode of the rest of the transmitted communication.

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, long-established practice should continue. To make changes now would only add to any confusion (the existence of which I dispute - established practice has been with us for many decades.) The present practice is recognised internationally as well as within the UK and the nearby Crown Dependencies.

There is one anomaly in the present system which could be considered for an update. Specifically, the regional locator is currently null for English stations with prefixes starting 'G' or 'M' (but not '2'). The use of 'E' always as the English regional locator would remove this anomaly.

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 strongly disagree. The main station is not the issue of concern, rather it is the current location of the source of transmissions, as indicated by the present practice of varying the prefix to use the regional locator.

Also, now that we have a progressive licensing hierarchy there should be no discrimination

against any one class of licence; all should be treated in the same way in regard to callsign prefix and regional locator.

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. The drafting of a new clause should take due account of standard practice in formal documentation (e.g. Quality Assurance instructions) with regard to the use of "may" and "shall"; "may" is regarded as introducing a suggestion whereas "shall" is regarded as introducing a mandatory instruction. The current licence has several uses of "may" which allow flexible interpretation; is "shall" intended?

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

No opinion.