

**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:**

This is my second attempt to response, for some reason it lost itself before completion.

**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; the bands should be made available on the same basis as others that are Secondary. They should be available on the basis of non interference to other services inside or outside the United Kingdom. I do not agree with the precedent proposed particularly paragraph 2.26.3 which I think should be removed in its entirety including the reference to 'electronic equipment'.

I further consider that since on low frequencies, namely 470 KHz, accurate near-field measurements can be difficult to determine accurately and unnecessary at the power levels permitted. The existing Clause (e) in the Schedule 1 Notes is more than sufficient.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**

No. I have experienced a circumstance where a club split up and the Licensee was with the majority group. The 'rump' group and the majority group both changed their names. RA/Ofcom revoked the licence and passed it to the 'rump' group even though the callsign had

been issued to the Licensee after the express request to the licensing authority by the family of the original, deceased, licence holder.

**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 but only the section that relates to the revocation of a licence on the basis of a Disqualified Person.

**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.

**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. I consider the existing station identification requirements are clear and necessary. These are frequently flouted at the present time. A clearly defined time interval is important because its removal or replacement with a vague 'practicable', would lead to the callsigns not being given at all. This is happening now and it appears that it is not being enforced by the Authority but only by example amongst amateurs. In my youth one of the 'nets' on 80 metres had a requirement that the participants could only join after demonstrating that they could talk non-stop for 60 minutes. You didn't have to identify at least every 15 minutes then, and that is why it was introduced by the GPO.

Identification should be in the modulation or mode in use.

**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 have never heard anyone voicing uncertainty of this sort, it has been crystal clear to those training and in the original licensing documents throughout the years. It has always been known that one changed the regional identifier when entering another country in the United Kingdom and it has been and is known with certainty throughout the world. This proposal would cause world-wide confusion .

**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. This will cause confusion too. The regional identifier does just that and reflects the country from which the signal is emanating. Using the main station identifier would make the whole system pointless for those operating from another UK country. It would be as if a foreign licence user using his home callsign while in the UK, such as a German licence holder using his DL callsign over here without indicating the country from which he was transmitting. I realise that there would be reciprocal requirements. I merely make the point.

**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.

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

Yes.