

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:

Thank you for the opportunity to comment.

Please do not make the changes I have objected to, as they would make life unnecessarily difficult and confusing for the Amateur Radio community both here in the United Kingdom and abroad!

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 if that would result in the addition of the existing Notice of Variation clauses to the standard licence/schedule. EITHER these bands should be available on the existing Secondary basis i.e. using exactly the standard wording "Available on the basis of non-interference to other services inside and outside the UK"; OR the Notice of Variation scheme should be retained to document the various special conditions that currently exist.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

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':

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?:

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?:

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 wording of the existing Clause 13 is clear and unambiguous. There is currently no need to transmit a call sign at "precise intervals" as implied by the consultation document, and the current maximum interval of 15 minutes sets a clear expectation of good practice. The wording "as frequently as practicable" is open to many different interpretations, but the existing rule is clear. Flexibility does not guarantee clarity!

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 - any changes to the licence wording that make RSLs optional will cause much more confusion than is currently alleged to exist. I am an RSGB Registered Assessor for UK Amateur Radio Examinations, have taught a wide range of ages and abilities about Licence Conditions, and have yet to meet a candidate who had any difficulty understanding the existing scheme. It has served very well for decades. No changes are needed.

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 - all classes of call sign should be treated the same way, by retaining the current wording of the licence. Making an exception for Intermediate licences will result in more confusion than is currently alleged to exist. See my answer to Q7.

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?:

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