

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. I do, however, agree that the bands should be made available to all Full Licencees but should not be treated any differently to other bands to which amateurs have access on a Secondary basis.

Also, the proposed clauses set concerning precedents that would radically change specific aspects of amateur radio in the UK if subsequently applied to other bands. In particular Paragraph 2.26.6, which should be omitted entirely, as well as the additional phrase 'electronic equipment' in 2.26.3

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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.

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, anything that improves clarity of meaning is to be encouraged.

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?:

Not entirely. The current practice of callsign usage and the current maximum interval of 15-minutes should be retained.

However the requirements that a station must be clearly identifiable at all times and that the identity be given in a format consistent with the modulation in use are supported. I do not see the need to specify that voice or Morse Code should be used.

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 mandated and widely accepted practice is fit for purpose. Changing it will lead to confusion both nationally and internationally.

Until such time as a problem is shown to exist it is better left as now.

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. Currently the prefix changes with the location being used as is thus consistent with the principle originally envisaged.

Retention of the current clauses allows all call signs to be treated in the same way.

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.