

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:

Consultation seems to have been poorly advertised and implemented.

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 acceptable as proposed.

I agree that Full Licencees should have access to the bands, but on exactly the same basis that other Secondary access bands are made to Amateurs, in the UK. If the current wording regarding secondary usage is currently acceptable, why does it need to be different for these bands?

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

No - Not acceptable as proposed.

I am not opposed to the re-introduction of a reasonable / nominal licence fee linked to inflation.

Ofcom will need to earn the fee by policing and acting upon un-licensed activity within the Amateur bands.

When Ofcom, introduced the current licence, it was described as a Licence for life that would be FREE.

Changing the wording as proposed will basically give Ofcom carte-blanch to do what they feel, regarding licence fees at any given time, is NOT acceptable.

Ofcom having first introduced the FREE licence for life, now seem to edging towards the re-introduction of a Licence fee with no clear framework. If this is NOT the case leave Clause 15 exactly as it is.

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.

A clear and simple definition of callsign usage is vital.

The current maximum interval of 15-minutes is well understood and should be retained, there is no obvious need for change.

Reference to any mode of identification does not need to be incorporated.

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 - Not acceptable as proposed.

The current, widely accepted and well understood RSL practice does not require change.

Changes to current practice will lead to unnecessary confusion and disruption and do away with more than 50 years of accepted callsign recognition practice.

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 - Not acceptable as proposed.

All call sign classes should be treated in the same way by retaining the current wording with respect to callsign prefix.

Re. proposal in Question-7, this introduces a different and discriminatory requirement for Intermediate Licensees.

By locking the callsign to the main station address, rather than the actual location of the transmission, serious confusion would most certainly arise, both within the UK and worldwide.

There would be direct conflict with the Q6 requirement for clear station identification and would cause inconsistency with Foundation and Full licensees.

What happened to the concept of equal treatment for all, something which Ofcom themselves have highlighted in their recent equality statement.

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. Acceptable, as proposed.

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

Yes. Acceptable, as proposed.