

representing:

Self

Organisation (if applicable):

N/A

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?:

In principle I agree with Q1 however I disagree with the possibility of paras 2.26.3 & 2.26.6 becoming part of the main licence & echo the RSGB position.

Whilst protection of equipment designed to operate in bands is essential, the proposed provision would seem to provide protection to poorly designed equipment that should be covered by the EMC or RTTE directives. This could potentially set a precedent that the Licence holder is responsible for fixing equipment issues that should be the manufacturers responsibility.

With respect to Paragraph 2.26.6, near-field measurements at these frequencies are very difficult to determine with any accuracy and in any case are irrelevant at the power levels in use. Clause (e) in Notes to Schedule1 of the existing licence is sufficient and does not need to be reinforced in relation to the 472kHz entry.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:

Agreed

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':

Agreed

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':

Agreed

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':

Agreed

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 opinion

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':

Disagree. I echo the RSGB position - "there is no need to change current mandated and widely accepted practice. Any change of current practice will lead to both confusion and disruption both nationally and internationally. To do otherwise would do away with more than 50 years of practice, widely understood throughout the world and would create far more confusion than is currently alleged to exist"

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':

Disagree. I echo the RSGB position - "All call sign classes should be treated in the same way by retaining the current clause in respect of the callsign prefix"

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?:

No opinion

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

Partial agreement

Allowing encryption has potential for abuse by both amateurs and user services. The ability to deal with interference issues will be problematic if the stations involved are using some of the sophisticated forms of Information, transmission and communication security measures that are available. A definition of acceptable encryption methods is required.