

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, however I agree that the bands should be made available to all Full Licensees but in exactly the same way as other bands to which amateurs have access to on a Secondary basis, by using the standard wording as applied to other amateur bands:

"Secondary. Available on the basis of non-interference to other services inside and outside the UK"

Regarding the wording of Paragraph 2.26.3, I think this should be in line with other clauses of the current license and the wording 'electronic equipment' be deleted.

Regarding the wording of Paragraph 2.26.6, in my opinion Clause (e) in Notes to Schedule 1 of the existing license should be sufficient and does not need to be reinforced in relation to the 472kHz entry. It is regarded that near-field measurements at these frequencies are very difficult to determine with any accuracy.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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, I agree with the proposal.

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, I agree that the word 'automatically' should be removed from Clause 4(5).

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, I agree, however I prefer the current wording in the licence schedule, but I am prepared to accept the proposal.

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 do not agree. I consider that the proposed wording in some respects is open to interpretation, in particular Paragraph 2.61. The current license schedule wording in my opinion is clear and adequate. I think radio amateurs should announce their callsigns at least on a regular mandatory basis. This ensures that anyone listening will be able to identify the transmission originator within a known specific time-frame. This is especially important in the case of suspected interference. When just listening, it is very frustrating to not be able to identify stations for potentially 15 minutes. The callsign enables identification and location (usually) and so is an aid to determining current propagation conditions, knowledge of which is very useful to amateurs for the purposes of experimentation and self-learning. Mention of 'voice' or 'morse' etc in Paragraph 2.61 is not necessary in my opinion; again the current license schedule wording is adequate.

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 do not agree. In my opinion there is no need to change the current mandated and widely accepted practice. Any change of current practice will lead to both confusion and much disruption both nationally and in particular 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. Again, as with Q6, the RSL allows immediate knowledge of the approximate location of the station transmitting and is hence a useful indicator to current propagation conditions particularly on the VHF and UHF

bands. Knowledge of which is part of the self-learning and experimentation aspects of amateur radio.

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, I disagree - 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?:

Yes, I agree with the proposal; however to avoid confusion it should be stated in the license that transmission from more than one location at once other than with remote or unattended operation is not allowed.

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

Yes, I agree with the proposal.