

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, not as proposed.

470kHz

- 2.23 states that 'there are no bespoke conditions which apply in relation to the use of these frequencies...'
- 2.26.3 states that 'The station must not cause interference to or claim protection from, other wireless telegraphy or electronic equipment.'
- o 'Or electronic equipment' is potentially very wide-ranging and certainly different from the present full licence conditions. In terms of non-interference, paragraph 5.1(b) mentions 'radio equipment', 7(3) and 7(4) mention 'other wireless telegraphy.'
- I would prefer that the phrase 'or electronic equipment' were to be deleted from 2.26.3 since it implies an extension of the non-interference requirements – and one which is couched in very vague terms. It would have significant implications for the amateur service if it were regarded as a precedent for other bands.
- If this extension is thought important for the 470kHz band alone then:
 - o this is a bespoke condition and the requirement for the NoV should stand.
 - o the reason for the extension should be made clear, especially since Ofcom has not in the past concerned itself with non-radio equipment.
 - o it should also be made clear that the requirement is for this band alone.
- 2.26.6 refers to 'suitable precautions, particularly in locations to which people have access, to minimise the risks associated with exposure to RF radiation'.

• This is again couched in vague terms.

o What is ‘locations to which people have access’ intended to mean?
 My garden contains my aerals and some people have access to my garden.
 Does it mean ‘to which members of the public have unrestricted access’?

• It could be interpreted by those hostile to the Radio Amateur service as requiring proof from the individual amateur that radiation from the aerals poses no hazard whatsoever. This raises all sorts of problems and potential for conflict.

• Why is this phrase thought to be important particularly for 470 kHz?

• The advice given in clause (e) in the notes to Schedule 1 of the full licence provides suitable advice which has been sufficient for all other bands. Therefore it should not be changed and 2.26.6 should be deleted in its present form. There is no need for special provision for 470 kHz.

5MHz

• 2.27.11 may only operate the station if contactable on a telephone

’located in close proximity to the station’.

• There is no requirement at present to provide Ofcom or other bodies interested in 5MHz with the licensee’s telephone number.

o It is not clear how this clause is to be enforced without this information.

o Even if the number were to be available for the main station location it might not be (even to the licensee, initially) for any temporary location as referred to in 2.27.10.

• If this provision is essential then this might be a reason to continue with the requirement for the NoV, granting of which includes the requirement for the telephone information.

• Para 2.62 notes that the proposed relaxation of identification rules would not apply to this band.

• Therefore 5 MHz is special (‘not allocated to the Amateur Radio service’) and this could be another reason to retain the NoV. I do not agree with the relaxation suggestion in any case.

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.

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.

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.

- Para 2.60 suggests that 'individual Radio Amateurs are best placed to decide how to go about identifying their stations'.

- Para 2.61 provides for a station being 'clearly identifiable 'at all times' and that a valid call sign be transmitted 'as frequently as practicable' during transmissions.

- Having recently returned to the bands after an absence of some 25 years I would, respectfully, completely disagree.

- o It seems to me that there are some amateurs who regard their call sign as a burdensome extra.

- o What does 'as frequently as practicable' actually mean? To answer this requires that someone explain what makes the transmission of a call sign impracticable!

- I would much prefer that the specified time for transmission of a call sign be reduced, not increased.

- To leave the time span to individual judgment is the worst scenario of all and suggests that identification is not really that important and that the first sentence in para 2.60 can mean what the licensee wants it to mean.

- It could result in licensees arguing with Ofcom over what para 2.60 means in practice and hence the requirement being unenforceable.

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 believe that there is any such uncertainty.

- Para 2.67 states that it is not clear to licensees whether they have a duty to use RSLs in Clause 2(2) of the licence.

- Clause 2(2) of the licence states that licensees 'SHALL use' (my capitals). How much clearer does it have to be?

- I have never heard of any licensee who has been confused by the use of RSLs.

- The suggestion is that Intermediate licensees must use RSLs but Foundation and Full licensees may please themselves.

- o This is the worst possible scenario – and has no basis in logic.

- o It will lead to much more confusion – contacts with Intermediate licensees will give the other station clear information about location, but with other classes of licensee might not since there would be no way of telling if the RSL is absent or unnecessary.

- If clarity is the aim, then the present system must be retained. There is absolutely no reason for changing it.

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.

• There is no plausible reason for treating the different classes of licensee differently. It is nothing to do with equality, but everything to do with logic. Clause 2(3) should stand as it is.

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.