

**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.

ref: 2.26.3. The requirement is too open ended. Some 'wireless telegraphy' equipment is poorly designed, e.g. wireless door bells, etc. Additionally, interference to and lack of protection from non-radio equipment has never been incorporated into the license.

This clause would be better to only require non-interference to licensed wireless telegraphy equipment with the 'no protection' clause removed.

If you must include 'electronic equipment', then I think there should be a requirement for such equipment to meet the current EMC requirements for susceptibility and emissions (conducted and radiated).

ref:2.26.6. Amateurs are required to be able to demonstrate compliance with license conditions if inspected. This clause is open to interpretation as to what 'suitable' means. A viable verification procedure should be specified.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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

No opinion.

**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.

A future change of government policy could easily result in Ofcom having to charge a commercial level of license fee with the political intent of a future sell-off of the secondary use UHF and SHF bands.

**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 currently worded.

ref: 2.61. The phrase 'as frequently as is practicable' could be interpreted as every transmission. This would be a considerable overhead with short transmissions. The current wording is making the requirement stricter, not more flexible.

**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':**

Maybe.

The use of RSLs could be optional. The list of RSLs to be used should be specified in the license.

The downside is that it will cause irritation to overseas amateurs who are 'collecting' regions.

The issue in 2.69 should be clarified if RSLs are to be used.

There should be consistency for all license types (Q8)

**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?:**

Maybe.

The approach used for RSLs should be consistent for all license types.

**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.