

**Representing:**

Self

**Organisation (if applicable):**

Amateur Radio Licence (Full)

**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 Document Section 3 Paragraph 2.111 - I would support the inclusion of an 'expiry' date, that being the date before which licence validation must take place.

Additionally, I would propose that Ofcom reconsider the current arrangement whereby the Amateur Radio Licence Section 1 and Terms, Conditions and Limitations Section 2 are numbered consecutively yet published and distributed separately, in favour of the previous arrangement of a separate Licence Document and Terms and Conditions Booklet.

This would simplify the amendment of either document without the need to amend page numbering.

Note: Amateur Radio Licence downloaded from Ofcom Licensing only provides pages 1 to 3 of 23.

**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.

Whilst the inclusion of the 470kHz and 5Mhz bands into the licence is welcome and supported there are some concerns over the specific paragraphs proposed.

470 kHz Band

2.26.3 - I Disagree. Delete this paragraph. - The Licence Terms Table C 2nd Column 'Secondary. Available on the basis of non-interference to other services outside the UK' is

sufficient and reflects the ITU Radio Regulations and the associated UK Frequency Assignment Table.

2.26.6 - I suggest this is deleted. The existing clause in the Note (e) to Schedule I of the Amateur Radio Licence Section 2 Terms, conditions and limitations is sufficient with the removal of the reference to the Health Protection Agency as it has closed down. A note referring to any published UK government or public authority guidance may be added if appropriate.

#### 5 MHz Band

The availability of this band to amateurs has enabled investigation into communications over short range using Near Vertical Incidence Skywave propagation. In recognition of this sharing arrangement it is important to include clauses ensuring appropriate protection for UK MOD radio communications.

2.27.6 Further guidance on the purpose and method of communications that may be established with military or military cadet organisations may be useful in furthering the training aspect of both amateur and military radio operators and could be included by means of a note or footnote referencing another source.

2.27.11 When the licensee is operating at a temporary location how is the requirement to be contactable by telephone achieved in practice and what notification requirements exist? The implication is that a home telephone number and mobile number, in the case of operation at a temporary location, are required. If held by Ofcom then they should be shown on the licence in Section 1 to ensure the licensee keeps them updated.

**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 fully support the proposals which will help amateur radio clubs and societies better manage their amateur radio licences and associated validations.

**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.

**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.

**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.

**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 disagree. Proposed Paragraph (a) cannot be achieved in practice as the station is NOT 'identifiable at all times' but only periodically when the call sign is transmitted. I propose that the unintentional non-compliance with the current or alternative text below should not be considered to be a violation of the licence terms but merely a lapse in good operating practice and any regulatory or licensing actions arising out of such operation should be modified accordingly.

Alternative Text (b) only:-

- (a) during initial calls ("CQ" calls) or calls to establish contact with another Amateur;
- (b) as frequently as is practicable but at least once every 15 minutes when the period of communication is longer than 15 minutes;
- (c) whenever the frequency of transmission is changed, at the beginning of transmission on the new frequency;
- (d) by the same type of transmission that is being used for the communication;
- (e) on the same frequency that is being used for the communication.

**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 disagree.

The existing arrangements for the use of Regional Secondary Locators should be retained.

**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.

The existing arrangements for the use of Regional Secondary Locators should be retained for all classes of amateur radio licence.

**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.

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

Yes - I agree.