

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:

0) It would be easier to comment on proposed rule changes, i.e. a change marked copy of the revised license, than on the "sketches" in the consultation document.

1) I hold a full license

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?:

Yes

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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, but - what happens to the license's validity and administratively needs to be plainly stated by OfCom, not necessarily in the license.

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 comment - but it does look like a Trojan Horse.

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?:

Echoing the text of the Radio regulations is a good approach. However, explicit guidance should be provided regarding "as frequently as practicable". AR voice operating practice is commonly florid reducing the effective channel capacity. The guidance should nudge (voice) operators to the cryptic styles used by marine and military operators : e.g. callee callee caller message caller over | out, as a maximum of verbosity. I note that, the 15 minute identification requirement of the current license may in many instances be a much longer interval that many interpretations of "as frequently as practical". Perhaps a minimum interval should be stated ...

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?:

Making it plain that RSLs are optional and that they are based on main station addresses would remove some confusion. Greater clarity would be achieved by abolishing the use of RSLs.

Making it plain that suffixes are optional will make plain that they are not required for regulatory purposes. Consequently, the guidance will be able to state that they should only be used where they serve a technical purpose. Greater clarity would be achieved by abolishing suffixes.

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?:

Yes, but it would probably be better to change all the intermediate calls to 2Gnabc - to achieve the clarity afforded by dispensing with RSLs.

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?:

Who knows - the objective is laudible and the mechanism plausible - but without a copy of the new boiler plate the question is moot.

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

Yes - but I would defer to RAYNET