

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, I do not agree with this proposal for the following reasons:

My main interest in amateur radio is the "technical investigation" aspect of the hobby.

I firmly believe that some frequencies should be reserved for just that - bands where technical amateurs can practice and explore a variety of methods, most particularly in studying propagation. I suggest that access to the

472 kHz and 5 MHz bands should continue to be by application for and award of a Notice of Variation, and such NOV should only be awarded when a valuable "purpose of technical investigation" is submitted with the application.

Continuing the practice of awarding NOVs for important activities within amateur radio raises the awareness on OFCOM's part of the number of amateurs who are dedicated to technical investigation. OFCOM's awareness and control

of users of the radio spectrum has become very lax in recent years and to remove the requirement of NOVs for use of other frequency bands will compound the problem.

I strongly object to Paragraph 2.26.3 of the consultation document. As amateur radio is an authorised Radio Service, OFCOM has a responsibility to protect it from interference, particularly from electronic equipment that is not designed to be used as wireless communication equipment. If paragraph 2.26.3 were to be included in the Full licence as it stands, this would enable OFCOM to slip its responsibility in this respect and abdicate from its role as protector of the radio spectrum and its users. To say that "The station ... may not claim protection from ... electronic equipment" is inadmissible. Paragraph 2.26.3 should be omitted.

Paragraph 2.26.6 should not be included in the Terms and Conditions of the Full licence. Technically knowledgeable amateurs conducting technical investigations are well aware that safety issues are associated with radiation and as responsible people do not need the Terms and Conditions of their licence amending. They know that the frequencies in question do not represent a radiation hazard at the power levels used in an amateur station. On these grounds alone the Paragraph should be omitted. Additionally reference is made to the Health Protection Agency, a body that was dissolved over one year ago, making Paragraph 2.26.6 obsolete.

My comments above give me cause to object to Paragraph 2.23 and 2.24.

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, I do not agree that Clause 13 of the Licence should be amended. Allowing for a simpler, more flexible approach is tantamount to diminishing the discipline associated with radio communication protocol. Clause 13 of the Licence is already simple, gives adequate flexibility, and is not over-prescriptive. The transmission of callsign at intervals not exceeding 15-minute is more than adequate.

The proposed provisions for Clause 13, as defined in Paragraph 2.61, do not clarify the

identification of stations. Proposal (a) that "a station shall be clearly identifiable at all times is not practical. It implies that station identification is made on a continuous basis, something unnecessary. Every 15 minutes is quite infrequent enough. Proposal (b) that "a valid callsign for the station be transmitted as frequently as is practicable ..." is inadequate. Who is to define what is practicable? Inclusion of this proposal could lead to misinterpretation of when identification was necessary.

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 the proposal to remove Clause 2(2) would clarify any issues of misunderstanding in connection with station identification and its location of operation. In my view, and I believe many others, the situation would be dramatically worsened.

I must say at the outset that I do not believe there to be any confusion as to the application of Clause 2(2) - it is easily understood in my view and the application of RSLs is well defined in the existing Clause 2(2).

A callsign serves two purposes; it identifies the station uniquely by its prefix and suffix; it identifies the station's location or country of operation by its prefix, or in the case of the UK by its RSL. Without Clause 2(2) confusion would certainly arise as to a station's location of operation if the discipline of RSL usage by location were to be removed. Tens of thousands of amateurs around the world know where in the UK they are in contact with from their knowledge of the UK RSLs. If a UK amateur used his own specific RSL, where applicable, regardless of which UK country he was operating from, then the station and its location is not being identified uniquely, resulting in misleading identification - expressly prohibited by Radio Regulations.

It is my belief that the so-called "confusion" has been stirred up by amateurs whose base station callsign is listed on their licence with an RSL and who want to continue using that RSL wherever they operate in the UK. For instance a licensee from Scotland, e.g. with the prefix GM, may decide to use his callsign with the GM prefix when operating in England. This would create confusion within the international community, thinking themselves to be in contact with Scotland when in fact the station was in England. If this change of usage of RSLs were to go ahead, it would be the end of the UK's reputation of having a disciplined approach to its *modus operandi*. The rest of the world would regard us with contempt. If OFCOM are determined to go ahead and destroy an already good working system of RSL as adequately defined in Clause 2(2), they should re-issue all licences with a basic G or M callsign. The appropriate RSL would then be used wherever the station was located.

It is essential that Clause 2(2) is retained as it stands currently. If genuine confusion exists as to the use of RSLs, then Clause 2(2) should be clarified - not that I suggest that is possible, it is already clear enough.

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. The Intermediate callsign holder should be dealt with the same way as Full or Foundation licence holders as per my remarks to Question 7 above.

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