

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:

I can not see what is wrong with the system as it is. You are proposing to make changes that genuinely appear to be "for the sake of change". Normally I am not against making changes - typically because they improve things, but I am sorry to say that this does not appear to make things better.

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?:

Not as worded.

The concept is fine (and I would welcome the additional band), but please include it as part of the existing use clauses - i.e. "Secondary. Available on the basis of non-interference to other services inside and outside the UK"

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

This would be a reasonable suggestion

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

There are always mitigations that may be considered

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?:

Undecided

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 genuinely struggle to see how the proposal fulfills either of the claims to make this simpler or more flexible.

The station should be easily identifiable at the start of transmission and at regular intervals (iirc every 15min) using the same form of modulation that the transmission takes.

It is also common practice to identify the station in CW for any experimental transmissions

We and the rest of the world find this remarkably easy to achieve (it would prevent us from responding if we had no idea who to respond to so clearly this works well already!)

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 - there is no need to change current mandated and widely accepted practice. Any change of current practice will lead to both confusion and disruption both nationally and internationally.

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 - Keep the rules the same for everyone.

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?:

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

RAYNET should be disbanded. It ceased to be a volentery responce organisation (and therfore deserving of special treatment) the day that they started to charge for membership