

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?:

I believe the NOV process has a useful function in making clear to amateurs that more restrictive terms and conditions apply to operating in these bands and fear that abolition of the NOV process may lead to an increase in violations of these terms and conditions.

Furthermore, I am against conditions such as 2.26.3 "The station must not cause interference to, and may not claim protection from, other wireless telegraphy or electronic equipment." appearing in the full radio license, even when applicable (currently) to individual bands.

So much apparently unregulated equipment is on the market these days, with poor levels of immunity to and suppression of RF emissions that we can do without such conditions in an amateur radio license.

In summary, I would favour the system of NOV's remaining in place.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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 useful step to easing the handling of club callsigns when members leave the club or pass away. I am in support of this change.

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':

I support this change.

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':

I support this change. It is easy to overlook revalidation when it is required so infrequently. Licensees should never be automatically revoked without some attempt to alert them to the need to revalidate.

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':

I support this change.

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':

I don't agree with this change. The requirement to regularly identify the station still exists and doing so after a period of 15 minutes is a reasonable requirement. If this is removed, I believe it will lead to confusion as to how frequently stations should be identified and that some operators will tend to slip into a habit of not identifying regularly enough.

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':

I strongly disagree with this proposal. Regional locators are useful in identifying the direction from which a transmission is arriving. Making them optional, so that a "GW" prefix might be in use from Scotland or a "MM" prefix from Wales will only serve to cause confusion. Stations should be required to use the prefix consistent with their current geographical location

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':

I disagree with this change.

Further to my answer to question 7, I believe RSLs should always indicate the location of the transmitting station and I don't see why this should be any different for an intermediate licensee except that they should, of course, use the "E" RSL in England.

The license conditions should make it clear that, if an RSL has been included in the license document, such substitution should occur when operating outside the region of the main station address.

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?:

I support this change.

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

I believe this section should clarify what parts of a message may be encrypted and how other amateurs will identify it as such. In other words, will the station still identify itself and announce that an encrypted message will follow? Will the encrypted message be sent using intelligible speech or will the encryption method be such as to completely obscure the transmission at the level of modulation or speech encoding?