

**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:**

In general I welcome the proposed changes; however, I do have concerns over the simplified guidance for Maritime Mobile operation which requires careful planning and control outside UK waters. I write as a Yacht Master who regularly sails in Central American and other waters.

I welcome the clarification of the use of / need for RSLs, as a mobile and portable operator the current arrangement creates significant confusion, especially in border areas.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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

This enables clubs to manage the allocation and use of call-signs and licenses that represent the club and maintain continuity of their use

**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?:**

Yes, however: it is important that station identification is given, in particular by users of "automated" stations.

**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?:**

Yes

This change will enable simpler and clearer identification of the station and its licensee and consistency of identification of the station when operating mobile, portable or at an alternative address. It will bring the UK into line with the majority of other countries. Operations that require the specific location to be identified - e.g. contests already have mechanisms to accommodate that are in common usage around the world.

**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

Practice will inform any future changes - in the short term removing the letter will present problems to any computer based logging or identification system

**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?:**

No,

The subjects raised in this section of the consultation are complex and probably require more than a single answer.

2.85 - It is reasonable for a group of members from a club undertaking a DXpedition or other remote operation should be able to use the call-sign allocated to the club (albeit that there may be a requirement for the actual licensee to be part of the group.

2.89 - is very complex; the term At Sea may be interpreted in a number of ways, especially when inside sovereign territorial waters of a CEPT or Non CEPT country and specifically inside the territorial waters of a country with no reciprocal arrangements with the UK.

Specifically operating within the confines of or the vicinity of a port without the agreement of or license from the appropriate sovereign state. Perhaps this clause relates solely to UK stations being operated within UK territorial waters.

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

Yes