

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?:

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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. There is no clear direction in the proposal. As frequently as possible is open to interpretation and abuse. How can a station be clearly identifiable at all times if the callsign is not given at prescribed times? Stations could fail to identify for a long time which would negate any reason for the identification to be carried out in the first place.

In my view Identification of the station should be kept as in Clause 13 (1) of the current licence. Without such a requirement, the use a callsign doesn't fulfill the proposed change to be "clearly identifiable at all times".

This equates to a dumbing-down of the regulations and should not take place.

In para 2.61 where you say:

a) a station must be clearly identifiable at all times;

I think you mean, that when a call sign is given, it should be made by phonetics so that it is clear and not just mumbled or run together which is so prevalent these days. Furthermore it should be given in full and not abbreviated by omitting the suffix for example. If my interpretation is correct then please spell it out so there is no ambiguity.

I am of the opinion that there is little wrong with the present Clause 13. It gives clear - and achievable - instructions as to how radio amateurs should act on making initial, and during, contact with other amateur radio stations. However, it doesn't address how identification should be made on leaving/terminating a contact with an amateur radio station - which I would suggest needs to be addressed.

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

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

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