

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 welcome Ofcom's attempt in updating the Licence conditions, but it would appear that much of the confusion referred to in the consultation document has arisen from less than careful updates in recent years since the BR.68 document formed part of the licence.

The stated approach of the consultation document is aimed at simplifying the conditions and consistency across licence classes. However, some of the proposed changes would appear to be contrary to this approach and would introduce confusion where none currently exists.

In some instances it is not clear exactly what the changes are that are being proposed and so it is not possible to support change in these instances. Given that much of the confusion currently reported by Ofcom seems to stem from Ofcom's own doing it is necessary for any changes to be clearly identified in order that the changes do not make the situation worse.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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 was the case for many years where a licence was issued to an individual, but on behalf of (o.b.o.) a specified club, and the callsign would remain with the club when the licence holder changed.

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'?:

No.

I am concerned at the wording of "ANY offence under the WT act". If the offence was not specifically related to amateur radio should that preclude them automatically from an amateur radio licence? Any revocation relating to an offence under the WT act should relate to the licence being utilised at the time of the offence. There may be justification for revoking all licences, but this should not be automatic.

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?:

Perhaps, but I assume that the special conditions for the 5MHz band would still remain. If Ofcom is aiming for a simplified licence with conditions that are common, then surely the identification conditions would need to be the same across all bands, whether the amateur service is a primary or secondary user?

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 currently no confusion in the wording of the licence as to the use of RSLs in the many radio amateurs I have spoken to recently. Clause 2(2) specifies "shall" which indicates a mandatory requirement. This should remain mandatory in order to identify the location of the station being operated within the UK. The proposed wording and the optional use of the RSL would only introduce uncertainty and confusion.

Again, if Ofcom is aiming for a simplified licence with conditions that are common then optional items such as the use of RSL must be avoided. The use of RSLs across all licence classes should be mandatory.

One area of confusion that could be removed is the use of RSLs for club calls, which is currently optional and seldom used. Either make the RSL for club calls mandatory or remove them altogether. I would suggest that as they are seldom used they should be removed.

It has always been the case that the RSL identifies where the station is being operated from and not the main station address. There is no advantage in using the RSL to identify the main station address when being operated from another location. I do not accept the argument that "a station could have MANY different identities in a SHORT period of time if the Licensee is mobile." There is no justification given for this comment and I would appreciate hearing the circumstances under which this would occur. If such circumstances do exist then the number of times this would occur must be so limited to make this not worthy of serious consideration. This comment should be disregarded as it is spurious as it is not backed up by Ofcom or in my experience.

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.

Again, this confusion seems to Ofcom's inability to apply their working practices in a consistent manner. Whilst some clarification of the licence may be necessary, I would prefer that Ofcom also updates their own procedures to make sure such mistakes in the issuing of licences with incorrect data inserted.

The call sign transmitted should identify the location of the station being operated and not 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?:

Again, any clarification, if needed, results from Ofcom's inability to understand their own licence conditions. Whilst remote operation is a topic that may need to be addressed, the use of a club call simultaneously from multiple locations is surely not permitted under the current requirements that state that operators must be supervised by the licence holder. If it is Ofcom's intention to allow such multiple simultaneous then it must be expressly specified as to how the licence holder is to maintain supervision.

I do not agree with this proposal until any revised wording is clearly published.

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

Yes.