

Representing:

Self

Organisation (if applicable):

Email:

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?:

No. I endorse the comments of the RSGB on this Question.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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, although I endorse the comments of the RSGB on this Question.

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, but with reservations. I believe the requirement that "a station must be clearly identifiable at all times" may be unworkable, as it implies -continuously- identifying the station. I suggest that the consultation document 2.61 (a) and (b) are combined to remove any ambiguity. I am also concerned that the specification of the mode that the identification should be given in may be restrictive, despite its best intentions, and would suggest re-wording along the lines of "the mode in use and/or any commonly used, conveniently and plainly readable mode".

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 generally agree that the use of RSLs should be clarified and made optional, however the world-wide nature of amateur radio and many years of precedent makes it prudent to retain RSLs as a clearly-stated option, and to mandate that, if used, only the geographically appropriate RSLs may be used (eg a station may only use xMxxxx in Wales). I broadly concur with the RSGB comments on the potential major impact that any changes to this may have in both UK and global terms.

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 agree in part. I think the Intermediate callsign, as issued, should not have a RSL, but that a RSL should be required to be inserted by the station to reflect the area from which the transmission is actually taking place, irrespective of the Main Station Address. So, for example, licensee 20ABC should identify as 2E0ABC when physically transmitting from England and as 2W0ABC when physically transmitting from Wales.

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 endorse the comments of the RSGB on this Question.

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

I endorse the comments of the RSGB on this Question.