

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:

I would prefer to see a nominal charge maintained for the renewal of licences. I feel that this would help to maintain a more accurate OFCOM database and encourage more responsibility on the part of licensees to renew their licence. This would then justify the removal of licences which are not renewed.

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 do not agree with this proposal as I consider that it could lead to problems of misuse on bands which are available on a secondary basis and could risk amateur radio in general getting an unfavourable reputation. I think that the current system of Notice of Variation should be retained as this would help to ensure that those requiring access to these bands are aware of the sensitivity needed in their use. The standard requirement-via the NOV should be as current i.e. "Secondary. Available on the basis of non-interference to other services inside and outside the UK" Furthermore some of the proposed clauses set concerning precedents that if subsequently applied to other bands would radically change specific aspects of amateur radio in the UK. Of particular concern is Paragraph 2.26.6, which should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3

With respect to Paragraph 2.26.6, near-field measurements at these frequencies are very difficult to determine with any accuracy and in any case are irrelevant at the power levels in use. Clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not need to be reinforced in relation to the 472kHz entry.'

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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, agreed.

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 -agreed.

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 - agreed.

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 - Not as proposed. I think that a clear definition of call sign usage and the current maximum interval of 15-minutes should be retained. However I do support the requirements that a station must be clearly identifiable at all times and that the identity be given in a format consistent with the modulation in use. I would prefer that specific terms such as voice or Morse Code should not be used.

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 : it would be detrimental to change the present mandate of accepted practice over many decades. This has stood the test of time as the clearest solution.

A change would be confusing both internationally as well as nationally.

The region of transmission should be retained in the definition and use of a Regional Secondary Locator (RSL)

I am not aware of any confusion caused by the present system which has been in use for some

50 years. It is widely understood throughout the world and is embedded within many international competitions and awards; e.g. as administered by the American Radio Relay League (ARRL). These competitions and awards are invaluable as one of the means of advancing training in amateur radio and aid technological advances in radio communications -including aspects applicable to future commercial developments as a result of these experiments

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. I consider that all classes of licence/(call signs) should be treated in the same way i.e. with the appropriate Regional Secondary Locator (RSL) being used to indicate the location of the TRANSMISSION by the Station.

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 - agreed.

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

YES - agreed.