

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

If you want part of your response kept confidential, which parts?:

Please keep my name and callsign confidential

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. Not as proposed. While I agree that that the bands should be made available to holders of a full licence the conditions of usage should be the same as those that already apply to other amateur radio bands that are allocated on a secondary basis.

I think that paragraphs 2.26.3 and 2.26.6 are unacceptable and should be withdrawn:

Paragraph 2.26.3 because it changes the current licence schedule by introducing a new requirement that an amateur radio station must not cause interference to non-radio equipment which in my opinion would constitute a major and significant change to the way amateur radio stations operate. It could also set a precedent regarding future licence requirements for other amateur radio bands. Does it also mean that Ofcom are going to change their current policy of not investigating interference to non-radio equipment or systems?

Paragraph 2.26.6 because clause (e) in the notes to schedule 1 at the end of section 2 of existing licence already adequately cover this requirement. Additionally, it is technically difficult to make meaningful near-field measurements particularly at MF frequencies.

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circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

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'?:

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?:

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?:

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. The term 'as frequently as practicable' is too vague and might be impracticable in some instances and in others open to misuse. I think it is essential that amateur radio stations are easily identifiable. It is therefore my opinion that the existing licence requirements regarding call sign usage, including the fifteen minute rule, should be retained.

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. No change required. The current requirement and practice has been in place for many decades and is generally recognised and understood both nationally and internationally. It is my opinion that the level of confusion to which Ofcom refers has been caused by historical inconsistency within Ofcom regarding call sign composition policy. Further changes will only cause greater confusion both nationally and internationally.

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 disagree. It is my opinion that the prefix of all classes of callsign must be treated the same.

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?:

Agreed.

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

Agreed.