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?:

I do not agree with this proposal
I believe that the bands should be made available to all Full
Licencees in exactly the same way as other bands to which amateurs have access on a Secondary basis. The standard wording applicable to other amateur bands should suffice i.e: "Secondary. Available on the basis of non-interference to other services inside andoutside the UK"

I am particularly concerned that some of the proposed clauses set precedents that if subsequently applied to other bands would
radically change specific aspects of amateur radio in the UK. My greatest concern centres on Paragraph 2.26.6. This should be omitted entirely, The phrase 'electronic equipment' in 2.26.3 should also be removed.

With respect to Paragraph 2.26.6, as a professional engineer working in the radio frequency field, I have very little confidence that in practice near-field measurements at MF and HF can be made sufficiently reliably to include limits within a formal document. It could also be argued that given that at the power levels permitted, such measurements are largely irrelevant. I believe that Clause (e) in Notes to Schedule1 of the existing licence issufficient and does not need to be reinforced in relation to the 472kHz entry

Radio Amateurs share frequency bands with other services on a daily basis, and conflicts are very rare.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:

I agree with this proposal.

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??:

I agree with this proposal.

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?:

I agree with this proposal.

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?:

I agree with this proposal.

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?:

I do not agree with this proposal.

I support a clear definition of callsign usage and the current maximum interval of 15-minutes should be retained. I 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 scheme in use. However, specific terms such as 'voice' or 'Morse Code' will serve to cause confusion.

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 do not support this proposal. As an active radio amateur, I am not aware of any significant movement directed towards change of the current mandated and widely accepted practice.

Any change of current practice will lead to both confusion and disruption both nationally and internationally. To do otherwise would do away with more than 50 years of practice, widely understood throughout the world and would create far more confusion than is currently alleged to exist.

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 do not agree with this proposal. All licence classes should have consistent rules: this appears to introduce an anomaly.

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 agree with this proposal.

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

I agree with this proposal.