

**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 do not with the wording of this proposal.

I think that these two bands should be made available to all Full Licencees in the same way as the other frequency bands to which Amateurs have access on a Secondary basis by using exactly the same wording as at present

"Secondary. Available on the basis of non-interference to other services inside and outside the UK!"

I am especially concerned about the wording of two of the proposed clauses: the phrase 'electronic equipment' should be removed from 2.26.3 and clause 2.26.6 removed as Clause (e) in the 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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**

Yes, I agree that the Club's call sign should remain with the Club when the current licensee no longer represents the club.

**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, 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?:**

Yes, I agree that the word "automatically" should be removed.

**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, but please keep Amateur electronic licences free of charge. Thank you.

**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 callsign usage and the current maximum interval of 15-minutes should be retained. This will provide clear identification and maintain and promote good operating standards.

However, 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 in use. However there may be other exceptional modes of transmission such as QRSS and other low bandwidth weak signal modes which may need further consideration but should be covered with the format consistent with the modulation in use.

**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 - please do not change this current mandatory and widely accepted practice of using RSL's as this will lead to both confusion and disruption both nationally and internationally.

The current use of RSL's has become accepted practice, having been well used for more than 50 years and is so widely understood throughout the world and therefore any change would cause massive confusion especially in contest and DX operating.

**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.

I think that all call sign classes should be treated equally by retaining the current clause in respect of the callsign prefix and by using the appropriate RSL.

**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, I agree with this proposal.

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

Yes, I agree with this proposal if the encryption / decryption of the message is done by the User service / Sub Agency and the RAYNET operator simply pass these messages via the Amateur Radio network, within the frequency bands and power levels associated with the licence level of the Licencee.