

Title:

Mr

Forename:

John

Surname:

Nunn

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

No

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 believe they should remain as an NOV for those keen enough who wish to apply to use these important bands shared with the MOD

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circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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. This should ensure the licence remains with the original club. It is a great pity that some individual club licence holders who have left the club act in such a selfish way by retaining the club licence when others at the club need to use it.

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. This seems a sensible approach.

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?:

No. While this might be politically correct, I think that the wording of 'Automatically' may still deter those from laxing on their revalidation of the Licence for Life

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?:

No. The 'Licence for Life' (mentioned in 2.18 by Ofcom) was introduced in 2006. A consultation took place at the time. The Amateur licence fee was then £15/annum. Many commented in that consultation response that if they continued to pay a fee they could then ask Ofcom spectrum regulator for assistance in cases of interference issues. Ofcom stated in reply "Ofcoms spectrum management and enforcement activities are not determined according to the level of the licence fee"

http://stakeholders.ofcom.org.uk/binaries/consultations/aradio/statement/statement_amradio.pdf

The "Licence for Life" was introduced as a free licence for Radio Amateurs to use the amateur bands provided the validation was done on-line at least once every 5 years. The only time a fee is charged is if the renewal is done by post. This is fully understood.

Therefore there is no reason to harmonise this at all with any fee paying commercial licence system

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. The last thing we need is an uncertain standard among operators. If those using the 5MHz shared band still need to adhere to a standard as regards identification then it should remain as before for all UK licence holders.

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. There should be no need for uncertainty as regards use of RSL. Continue as before so that locations identification is clear. I also believe in the description of reasoning Ofcom should state how many 'Stakeholders' of the 60,000 + Amateur Radio licence holders approached Ofcom and asked for this to change

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?:

Yes. This should be done anyway as it is clearly documented in the licence now, and has been in use for over a decade so there cannot be any real issues here.

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 believe some further clarity will help.

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

Yes. This should allow Amateur Radio operators to provide further assistance to user services under RAYNET.