

**Title:**

Mrs

**Forename:**

Mary

**Surname:**

Paget

**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 - Not as proposed. I agree that the bands should be made available to all Full Licencees but 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 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 Schedule1 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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:**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

**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??:**

No view

**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 view

**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 view

**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. This is a further unnecessary reduction of operating standards. A clear definition of callsign usage and the current maximum interval of 15-minutes should be retained. However 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 are supported (but 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 view

**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 believe the proposed changes to the RSL are unwarranted, ill conceived and totally unnecessary. Neither the ITU or IARU have requested these changes and I understand are at the insistence of OFCOM's over zealous legal advisors who have not looked fully into the ramifications of this proposal in an attempt to fix a problem that isn't there.

Each of the UK nations are counted as separate entities for amateur radio awards and contests purposes and the proposed change the RSL will make it impossible to properly indentify which of the UK Nations the station is operating from. This can only result in one outcome, all 6 UK nations would only count as 1 entity to the detriment of those radio amateurs not based in England. Given the will of all of the major political parties to devolve powers to each of the UK nations following the Scottish referendum this proposal sends the wrong message. I for one will lobby both my MSP and MP to contact you regarding this proposal should it be implemented and ask that all political pressure available is applied to reverse this ill conceived proposal should it implemented. I am aware of at least one MSP who is a radio amateur and feel this is something he will have a view on this even though it is not a devolved matter. Perhaps it should be devolved as the current stewardship by OFCOM is not serving the amateur radio community all that well due to total lack of recourses.

I ask OFCOM to save the embarrassment of a U turn due to political pressure that would be sure to follow and listen to the amateur radio community, its national organisation and bury this proposal.

**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?:**

See above.

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

yes