

Title:

Mr

Forename:

Gerald

Surname:

Peck

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. At present there is a requirement for a mobile phone number to be made available for contact purposes as a requirement for operation on the 5MHz band. This is obtained through the NoV process. Allowing all Amateur Radio (Full) licensees access to the band will require all such licensees to submit an appropriate number whether or not they intend to operate on the 5MHz band. Please retain the NoV process for all bands that are not generally permitted and make none of the other changes that are proposed.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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 in principle. However, I believe at least two officers of a club (Chairman and Secretary?) should provide written confirmation that the representative that holds the licence is an actual club member and that those officers are required to advise Ofcom when the situation changes, either in respect of the licence holder or of their own office. That would then provide Ofcom with the details of a minimum of two current contact persons at all times.

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

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

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, this makes sense.

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. I am of the opinion that the existing definition is fit for purpose and should be retained. There is no need to refer to modes of operation.

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. This is nonsense. There is no need to change the current mandated and widely accepted practice that has been in place for over half a century.. Any change to current practice will lead to confusion and disruption both nationally and internationally. It is important that the region of transmission should be retained in any definition and use of a RSL. The confusion that is alleged does not exist and never has.

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 All call sign classes should be treated in the same way with the appropriate RSL being used to indicate the location of the transmission by the station. It is a nonsense for a callsign to relate to one country when the operation is taking place in another.

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 in general, provided that no operational changes are required.

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

No comment. This question should be specifically addressed to experienced and regular Raynet controllers.