

**Title:**

Mr

**Forename:**

David

**Surname:**

Penny

**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?:**

I do not think that any variation is needed from the current terms applicable to use of a band allocated on a secondary basis. I think that any use of such bands should be permitted only to full Licence holders.

I do not accept the section 2.26.3, which refers to interference. Firstly, equipment that is not intended to receive radio signals should be designed and built to avoid this happening. It is

totally unacceptable that such equipments should be protected against legitimate signals from radio amateurs (or any other licenced sources eg CB). If interference is experienced, it should be the user of the equipment that sorts out a cure, and pays any costs involved, or lives with the interference.

Equally, it is unacceptable that equipments not licenced as transmitting devices should be permitted to cause interference to legitimate amateur radio stations. Such equipments eg plasma televisions, door-bells, baby alarms etc etc should be shut down until the owners have demonstrated that a cure for the interference has been properly and permanently applied.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**

It seems a proper change to make, as it is often very important to a club that it is able to retain a specific callsign for club usage - often there has been significant expense in such things as printed materials (eg QSL cards, banners, headed note-paper etc), and it could cause confusion for other clubs and persons if the call is re-allocated in some way.

**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':**

This seems reasonable, although I wonder if being prosecuted for failure to buy a television licence would be included in what seems to be a catch-all clause?

**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, please! To become illegitimate through failure to remember something that only happens every 5 years is not a happy situation - although I do wonder what OfCom would actually do about someone who has continued to go on the air after failure to re-register? Indeed, how would they know?

**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.

**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 think the current requirements are specific enough, they have stood the test of time, and if adhered to allow the location of the transmitting station to be reasonably determined. I think that the requirement for the identifier to reflect where the station actually is at that time is essential. Simply using the main station identifier all the time is useless and confusing. A specific time limit for repeating callsign and/or location (if not at the main station) is specific and workable, whereas the proposed wording is loose, and open to personal interpretation.

Any identification should normally be done using the modulation mode that is being used for the transmission - it is not necessary to be specific about what mode should be used. For instance, when using RTTY, the identification is normally done within the teleprinter messages, which should be sufficient for the purposes of identification.

**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! For operational reasons, and a host of spin-off reasons (Contests, awards, turning highly directional beam aerials in the right direction, etc) UK amateurs should be required to give a callsign that includes the location of where the transmitting station actually is (Scotland, England etc).. The current system is well understood, here and abroad, and is an essential part of our normal operation.

**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 think that the callsign should always identify where the transmitting station actually is located. The location of the main station is of no significance, except when it is being operated from.

**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?:**

No - I doubt it, although it depends on what is actually defined. This is a tricky problem. With regard to aeronautical operation, is it or will it be illegal to operate from a tethered balloon, or one in free flight? Also, I own a narrow-boat which is kept on the Broads. When I transit the various rivers to gain access to the different Broads, and cross tidal waters (and much of the Broads is tidal in any case), am I able to use my transmitters, and would I normally use /M or /P?

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

Yes - I think this would be an improvement.