

Title:

Mr

Forename:

Richard

Surname:

Perzyna

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?:

None.

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Dear Ofcom - Amateur Radio Division;

Re: Consultation published 09/09/2014 - Amateur Radio Licence review.

I would be grateful if the following could be included for consideration; either separately or as an addition/amendment to my on-line response - already submitted.

1. Paragraph 2.26.3. *“The station must not cause interference to, and may not*

claim protection from other wireless telegraphy or electronic equipment.”

2. Paragraph 2.26.6 “*The licensee must take suitable precautions, particularly in locations to which people have access, to minimise the risks associated with exposure to Radio Frequency (“RF”) radiation*”

The wording "electronic equipment" brings forwards a precedent into Amateur Radio that is not currently in existence. The current 'secondary interference' clause as applied to Amateur Radio is both sufficient and proportional to protect both Radio Amateurs and licensed other users of the RF spectrum.

Similarly the wording of the RF protection clause is not proportional to Amateur Radio within this context.

Both suggested amendments are inconsistent with Amateur radio as a "self-training hobby" rather than an experimental or licence-free business model.

Specifically on this basis I must review my reply to be "No, I do not agree".

Thank you for your assistance in this matter - and please accept my apologies for any extra work that this causes.

Richard Perzyna, G8ITB.

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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?:

If the appropriate spectrum owners (i.e. MOD, etc.) or other interested parties have no objections; or their requirements are factored into any Amateur Radio (Full) Licence then the proposal should be acted upon.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

Full (Club) Licences need to be "tied" to the club they represent - rather than an individual. This may be a difficult matter to resolve within current legislative descriptors and Ofcom needs to take a view from outside-the-box to specifically define a Club licence and its holder's requirements.

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??:

Simply "Yes" - however see my answer to Q2 for the possibility of new licence holder requirements for a Club licence. This is a tidying-up of the conditions and should not be seen as contentious.

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 problem with the wording as it stands - however; due to the problematical nature of Ofcom's web renewal system it may be practical to alter the wording to allow a period of grace; i.e. 6 months; then automatically remove. Surely the Ofcom software would allow a web page set out by date showing the call signs in the grace period.

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 problems with the change.

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 do not believe that the current requirement is onerous in any way - it may need simplification in wording; I doubt it - and/or more emphasis during licence training.

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?:

RSL's should reflect the current location of a station within the UK. This should be a mandatory requirement. This would ease the uncertainty. As currently stands making things (i.e. suffix information) seem a mandatory requirement and then stating that they are not obligatory is confusing.

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?:

The main issued call sign - and RSL - should reflect the main station address. Use within another part of the UK (different principality or country) should also be reflected in the call sign used - as currently suggested it appears that minimal thought has been given to the matter - apart from sending it to a Govt lawyer for definition!

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?:

Tidying up clauses is not a problem - the problem is to take literal legal interpretations at face value - as they are the easiest - and laziest - thing to do!

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

The clarification for temporary repeater installation and use within a RAYNET scenario is welcomed. I wonder however where the encryption problem came from! I may be wrong - but this seems to be an American health system legal issue that has been transferred to this side of the Atlantic by someone, who has then stated "Hey, we have a problem".

In general terms - agree with the changes.