

Title:

Mr

Forename:

John

Surname:

Petters

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:

As a general observation, the amateur radio license works quite well. It is important that call signs are given regularly and clearly for identification purposes.

I disagree most strongly at the attempt via the back door to remove the protection afforded to the amateur service from interference by electronic equipment, which often fails the EMC regulations. More such equipment is coming in illegally and amateurs are likely to be the first people to spot this when new interference arises and they provide an important safety check of fake goods bearing bogus CE marking. Ofcom has regularly failed in its statutory duty to protect the spectrum from such sources as plasma TVs, switch mode power supplies and in particular powerline network adapters. I further disagree with the idea that an amateur station must not interfere with any other WT or electronic equipment. This is already accepted as long as the station is operating within the terms of his license and therefore his equipment is

not at fault. However this opens the floodgates to unscrupulous dealers flooding the market with cheap electronic junk which fails to comply with the EMC regulations with regard to immunity from picking up RF. Ofcom needs to fully implement the EMC regulations to ensure that equipment does not interfere with the reception of amateur radio signals and similarly is not impaired when operated close to an amateur radio station. This is a matter of good design practice, which is sadly lacking. Ofcom should immediately, using its powers under the WT act, prohibit the use of powerline network adapters and must take enforcement action against any polluter of the spectrum when it identifies equipment as causing interference. It should also ensure that the law under the TV licensing regulations to revoke a TV licence is operated when TV's cause interference to the radio spectrum.

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 Schedule 1 of the existing licence is sufficient and does not need to be reinforced in relation to the 472kHz entry.

Ofcom should fully protect this part of the spectrum from interference from other electronic equipment, including PLT, TVs, SMPs etc and should properly enforce the emc regulations and prosecute where equipment causing interference to a licensed amateur station is experienced. It has the powers under legislation to do this as it did during the Olympics. The spectrum needs protection at all times and Ofcom is taking a perverse view that amateurs on the one hand, who are responsible individuals must not cause interference whilst any other person can. Where an amateur causes interference through his own failure to maintain or operate his equipment it is right that action should be taken against him - but if the amateur is operating correctly within his license conditions and interference is caused as a result of equipment failing to meet emc regulations, then Ofcom must enforce against the user. Ofcom has blatantly failed in its duty to do this over a considerable number of years.

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?:

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

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. 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 - there is no need to change current mandated and widely accepted practice. Any change of current practice will lead to both confusion and disruption both nationally and internationally. To do otherwise would do away with more than 50 years of practice, widely understood throughout the world and would create far more confusion than is currently alleged to exist'

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 I disagree - All call sign classes should be treated in the same way by retaining the current clause in respect of the callsign prefix'

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.

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

Yes