

Title:

Mr

Forename:

Anthony

Surname:

Pugh

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:

Resubmission.

I'd like to express my disappointment that the opportunity wasn't taken to tackle the other topics that were brought up in Ofcom's original statement.

This has led to much confusion, and accusations that the topics were removed at the behest of the RSGB.

The matter of callsign RSL, and suffixes, seem to have been turned into a problem that I've never seen evident in my 50 years involvement with amateur radio!

Related to valid/invalid licences, it would be a great help if there was web access to a current list of valid callsigns.

No other details, just a means of knowing the callsign we are given is valid.

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 described in the document.

They should be made available, to full licence holders, but UNDER THE SAME TERMS AND CONDITIONS AS CURRENT BANDS.

“Secondary. Available on the basis of non-interference to other services inside and outside the UK”

The phrase “The station must not cause interference to, and may not claim protection from other wireless telegraphy or electronic equipment.” is too far reaching, and leaves licence holders in the position where even a technically perfect station could have problems due to the technical failings of even non radio equipment.

It's ridiculous enough to have to worry about, sub standard radio equipment, being used by others, let alone non radio equipment.

The licence doesn't need any more constraints on terms and conditions.

Paragraph 2.26.6 is unnecessary at the power levels, and difficult to measure anyway.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

Agreed.

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':

I always thought it was covered but, obviously, Ofcom must feel the need for this clarification so Agreed.

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?:

Agreed.

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?:

Agreed.

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).’
The RSGB view expresses mine exactly.

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.
I've no idea where any confusion can have arisen.
My licence, issued 1966, made things perfectly clear.
My home was in Wales, and the callsign issue was G8ASD.
The terms and conditions made it perfectly clear that I should use the relevant RSL at all times.
So, at home, I was GW8ASD.
This format, of using the relevant RSL has worked well for the nearly 50 years I've been licenced, so why the need to change to a much more confusing format?
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‘
Similarly with suffixes.
The use of /A, /P, /M, /MM never seemed to be an issue.
None of the above has ever been a point of concern, until this document!

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’
Using the country identifier of the main station is a nonsense, and totally unnecessary.
The callsign should reflect the actual location, as is current practice.
Surely Ofcom's records can cope with that?

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?:

Agreed.

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

Agreed.