

**Title:**

Mr

**Forename:**

Ken

**Surname:**

Punshon

**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?:**

Not as stated. Yes, by all means add the bands, but why should these bands have specific wording when the issues are adequately covered in the standard wording?

**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**circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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, this seems like a logical approach to solving the problem of club licensing in a manner consistent with current usage for ships.

**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. Aligning the wording with existing, sensible, practice is appropriate.

**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?:**

Whilst consistent wording is appropriate this will hopefully not result in inappropriate charging!

**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. Retain the existing 15 minute requirement for identification to be given, but with no specific wording on the type of modulation.

**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 would cause chaos around the world by changing long established practice for no good reason (the existing confusion is surely minimal).

**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?:**

Absolutely not. All callsigns should be treated the same and the chaos of Intermediates operating with a 'home' callsign in a different region should be avoided.

**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 so far as I understand the explanation!

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

Yes. Should mention perhaps be made of the type of encryption (e.g. 'user service')?