

Title:

Mr

Forename:

John

Surname:

Rabson

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?:

With caveats, I support the idea of opening these bands up to Full Licensees.

1) There is however a prospective problem in the proposed reference to "electronic equipment". It has been the accepted view for many years that, if EMC problems arise with non-radio electronic systems, the fault is unlikely to lie with the radio amateur. If the proposed clause were inserted in its present form, it might in effect open the floodgates to the use of non-radio equipment that is "poorly designed, constructed, maintained or used", with the risk of generating a significant number of complaints.

2) If radio amateurs are to be required to estimate or measure RF fields, it is essential that any methods specified are clearly laid down and feasible for the ordinary licensee to use.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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?:

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?:

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?:

The existing system has stood the test of time. The only amendment I would suggest would be to omit reference to specific transmission modes and simply refer to a modulation format consistent with that in use.

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?:

The existing practice has worked well for many years. There would seem to be no great reason to change it ("if it ain't broke, don't fix it").

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?:

It is not clear to me why Intermediate licensees should have to follow a different rule from others.

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?:

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

Yes.