

Title:

Mr

Forename:

Christopher

Surname:

Read

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?:

NO

Clause 2.26.3 is completely unacceptable: the phrase "or electronic equipment" requires deletion.

All spectrum users, not just Amateur Radio Licensees, are suffering increasing levels of interference from poorly designed and constructed electronic equipment. Whilst this clause only applies to one amateur band; it would set a very dangerous precedent for all licensed

spectrum users.

Clause 2.26.6 is superfluous, given the general requirement for protection from harmful RF exposure.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

These changes are long overdue.

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

If the requirement for re-validation every 5 years is to be retained, it should be made clear that the licence is a 5 year licence. Unfortunately, the current licence is known as a "lifetime licence", which it is not.

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

I do not agree with clause 2.60: the current requirements are not over prescriptive, and should be retained.

The phrase "as frequently as practicable", in clause 2.61 is too vague and may one day

require hours of the court's valuable time in order to establish case law on exactly what is "as frequently as practicable" in this context.

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?:

Not entirely.

This has become a mess. There are 5 options:-

- 1) Mandatory use of a regional secondary locator (RSL), based upon the main station address and specified in the licence document.
- 2) Mandatory use of an RSL, based upon the current location of the transmitter.
- 3) Optional use of an RSL, based upon the main station address.
- 4) Optional use of a regional secondary locator, based upon the current location of the transmitter.
- 5) No RSL.

My preference would be for (2) or (4) above. Both of these options would require licenses to be issued without specification of the RSL in the callsign associated with the licence. This approach would also clarify CEPT use, where the use of RSLs creates considerable confusion.

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?:

Not entirely - see (7).

Additionally, has Ofcom considered issuing intermediate licences with a Radio Regulation compliant, non-geographic callsign? If not already in use, 2M1ABC would be the obvious choice.

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

Personally, as a certified first aider, with life support and dive emergency training, I would

like to see a clause which specifically allowed use of amateur frequencies in safety of life situations; assuming that this is not already enshrined in the Radio Regulations.