

Title:

Mr

Forename:

Nicholas

Surname:

Reddish

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:

Having already submitted a response (15/10/14) I wanted to add an update having just read that Ofcom was going to permit Cornwall to use the secondary locator "K". I do not understand why this is being allowed particularly as this consultation is suggesting significant changes in the area of RSL's. Introducing a RSL for one specific county is not viable or desired by the majority of radio amateurs. If you permit Cornwall then you must allow a locator for every county in the UK and this adds a level of complexity that is not wanted. I strongly believe that this should NOT be introduced to our hobby,

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.

Whilst I applaud Ofcom in looking to make these bands available to full licensees I do not see why this cannot be achieved by using the standard wording applicable to other bands where licensees only have secondary access e.g. "Available on the basis of non-interference to other services inside and outside the UK".

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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?:

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.

Whilst I strongly agree with Ofcom that "a station must be clearly identifiable at all times" and applaud Ofcom's desire to allow licensees "to use their stations more freely or flexibly" I do not feel that this approach to station identification is the right way to achieve Ofcom's objective. I say this because I strongly disagree with the statement that the "call sign be transmitted 'as frequently as possible'". This is because such a statement is ambiguous and would lead to much confusion on the amateur bands, where individual operators would have different interpretations from those of other stations as to what "as frequently as possible" means. We (licensees and Ofcom) need to remember that the fundamental basis on which

Amateur Radio exists is based on "self training in radio communication" and the identification of stations is an important part of the "user experience" for most interested parties. As an Amateur Radio licensee we must be aware that any QSO that we are part of is of interest, not just to the operators contributing to the conversation, but also to a large number of Short Wave Listeners, other licensed amateurs, radio experimenters, investigators of RF interference etc. where knowing who is talking (and where they are located) is very much fundamental to their enjoyment of the hobby. If any Amateur Radio licensee doesn't believe this to be true then there are other mediums (such as the Phone, Skype, Twitter, Facebook, SMS etc.) that would be a more appropriate place for their content. As such the use of the call sign is something that any Amateur Radio licensee should be proud of and should be encouraged to be used at regular intervals by Ofcom. It is therefore my opinion that guidance from Ofcom is required to ensure that an licensee understands at what frequency the call sign needs to be announced. This needs to be detailed in the licence and be a fundamental part of any training given to potential candidates of the various Radio Amateur exams. My recommendation is that the current licence (clause 13) should be retained (i.e. beginning and end of transmission and at 15 minute intervals).

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, No, Absolutely Not !

I've been licensed for over 30 years and I have never been in a situation where any licensee has either been confused by this current practice to vary the prefix by region or has expressed a desire that the licence is changed in the way that Ofcom is suggesting. I do not therefore accept the statement that there is "current uncertainty amongst Radio Amateur licensees in relation to Clause 2(2)" as my experience is very much to the contrary. In my view, any change to the current practice will be disruptive and confusing to both UK licensees and overseas operators. I fully recommend that the current practice is left unchanged. If the current licence regulations do not accurately align to the current practice then the regulations should be modified to reflect current practice rather than changing what has been common within our hobby for over 50 years and is widely understood throughout the world.

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.

This is unnecessary as long as the RSL's are left unchanged in the licence. In my view all licence class should be treated the same with respect to identification / callsign prefix etc.

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?: