

**Title:**

Mr

**Forename:**

David

**Surname:**

Redman

**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 - Not as proposed. I agree that the bands should be made available to all Full Licencees but in exactly the same way as other bands to which amateurs have access on a Secondary basis. The standard wording applicable to other amateur bands should suffice i.e:

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

Furthermore some of the proposed clauses set concerning precedents that if subsequently

applied to other bands would radically change specific aspects of amateur radio in the UK. Of particular concern is Paragraph 2.26.6, which should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3

With respect to Paragraph 2.26.6, near-field measurements at these frequencies are very difficult to determine with any accuracy and in any case are irrelevant at the power levels in use. Clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not need to be reinforced in relation to the 472kHz entry

Remember 'electronic equipment' includes that which may or may not be compliant with the requirements of the EMC or other (e.g. various medical) Directives - one example being where the victim equipment may be old enough to pre-date the requirements.

Ofcom do not investigate cases of non radio interference so radio amateurs should not be restricted in their radio license by having the phrase 'electronic equipment' included in paragraph 2.26.3

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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

**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'?:**

In principle supported but only for a second conviction

**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 , with the proviso that if the Radio Amateur wishes to reinstate his/her license with the 12 month of the license lapsing then it should be automatically reinstated. If OFCOM cannot issue a simple e mail reminder say 3 months before license lapse then the reinstatement protection as suggested above should also be included

**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 - 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 proposed change still says we have to ensure we keep identifying ourselves, but doesn't state a time. This will just make things more confusing, not less.

**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 - 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. If it has to be changed then go back to an early form of the Amateur radio license had the clause

Call Sign and Notification of Location

(1) Whenever the Station is used the call sign mentioned on the first page of this Licence shall be transmitted: Provided that when the Station is used -

(a) at an address other than the main address the Licensee shall, in order to indicate the country or place of use, vary the prefix letter to the call sign by using the prefix letter(s) appropriate to that country or place, being G for England, GM for Scotland, GW for Wales, GI for Northern Ireland, GC for the Channel Islands and GD for the Isle of Man:

(b) at the temporary premises the suffix "/A" shall be added to the call sign

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(c) at the temporary location the suffix "/P" shall be added to the call sign.

**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'

**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?:**

g6jyb

Moderator

I think we can be clear on what Ofcom is proposing re Maritime.  
It is to delete clause 17(e) which is the redundant definition of "At Sea"

This will unambiguously leave /MM exactly as it is today as:-

Clause 17(ss)

"Vessel at Sea" means a Vessel operating on the seaward side of the low-water line along the coastline as marked on large scale charts officially recognised by the relevant coastal state;

- anything else is Inland waters as per 17(tt) and would be /M

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

No , all Amateurs may transmit messages when requested by approved user services, or sub agencies working for those user services. Transmissions must be within bands and power levels associated with the licence level of the Amateur. It's as simple as that. If we have a national or local emergency Amateurs should not feel in anyway constrained by their licence, other than bands and power