

**Title:**

Mr

**Forename:**

Colin

**Surname:**

Redwood

**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:**

My amateur radio callsign is G6MXL

**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?:**

470 kHz - No unless para 2.26.3 of the consultation is removed. If para 2.26.3 of the consultation is not removed, then it should remain on a NOV basis.

5 MHz - Yes - although this might be better timed to reflect the output of the next World Radio Conference (WRC). There needs to be some clarification of how Ofcom will be notified on the telephone number referred to in para 2.27.11 of the consultation.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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

No.

I don't see any need to write reminder letters to those who have failed to revalidate.

A proportion of the letters currently produced are going to amateurs who have upgraded from Foundation to Intermediate and/or from Intermediate to Full licences. In many cases these amateurs have assumed that 'lower' level licence(s) will automatically be revoked either immediately on acquisition of the higher level licence or after five years. I see no need for Ofcom to incur the administrative and postal costs of producing and posting these letters. In addition, I understand that the current letter fails to quote the callsign of the licence that has not been revalidated. Adding the callsign in question to the letter would reduce unnecessary correspondence and phone calls to Ofcom in these cases.

I propose simplifying the process for those amateurs with more than one licence. Namely automatically revoking licences that have not been revalidated, followed by a simple letter, including the callsign, advising that this has taken place.

**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?:**

No.

When the last licence review took place, radio amateurs suggested that Ofcom charge a small (annual) fee for amateur radio licences. Ofcom were totally against this and eliminated the fee previously charged. It seems strange to want to introduce such a clause when there is no immediate intention of charging a fee.

**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 (with one very specific exception)

The current arrangement is fine for nearly all amateur operations and should be retained as-is. The one exception being where the current arrangements are impractical such as ultra-slow data modes where for example Morse code is being sent at a speed such as one dot per hour.

I would propose changing the wording to read,

"Stations must identify a) during initial calls or calls to establish contact with another Amateur; b) at least once every 15 minutes; c) whenever the frequency of transmissions is changed, at the beginning of transmission on the new frequency; d) by the same type of transmission that is being used for the communication; and e) on the same frequency that is being used for communication. Exceptionally, where these requirements are impractical due to the method of transmission (e.g. ultra-slow Morse and ultra-slow data modes), the station identification should be as frequent as reasonably practicable during the course of transmissions."

**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?:**

Absolutely NO.

Current custom and practice is for amateurs operating in the British Islands to use the Regional Secondary Locator that corresponds to the part of the British Islands from which they are operating and not their main station address.

I have analysed over 3,000 contacts involving over 500 different stations in the British Islands made during a VHF contest in June 2014 that I adjudicate, and it is clear that without exception amateurs use the Regional Secondary Locator that corresponds to the part of the British Islands from which they are operating.

Many amateur radio operating awards and contests are linked to the regional secondary locator ("country") from which a contact is made. Currently radio amateurs world-wide reliably establish the "country of operation" from the callsign (including the regional secondary locator). Any other approach will just create confusion in the amateur community in the British Islands and internationally - and reflect badly not only on amateurs operating in the British Islands but on Ofcom.

If this consultation is to be anything more than a 'going through the motions' exercise, then Ofcom really must listen to the voice of its stakeholders and require amateurs to use the regional secondary locator that corresponds to the part of the British Islands etc. from which they are operating. I can see no disadvantage to Ofcom with this approach.

**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 NO. See my answer to Q7.

**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?:**

Broadly Yes . However I have some reservations in respect of encrypted messages (para 2.97.2 of the consultation).

I am struggling to think of instances where there could be a genuine need to encrypt messages.

Even if there is a genuine need to encrypt some messages, then there must be an explicit statement that requires station identification in the clear (un-encrypted). Without the specific requirement to identify in the clear, the use of the amateur bands by un-licensed operators would be undetectable and potentially be a cover for all sorts of illegal activities by criminals, terrorists etc. The suspicion of such activity could result in additional queries from licenced amateurs to Ofcom and additional investigations by Ofcom.