

Title:

Mr

Forename:

John

Surname:

Regnault

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 - as currently worded the proposal contains several significant flaws. I agree that the the 470 kHz and 5 MHz bands should be made available to all holders of Amateur Full Licences on a permanent basis but this should be done 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"

The area where the proposed clauses are significantly flawed are Paragraph 2.26.3, which

should be omitted entirely, as should Paragraph 2.26.6. With respect to Paragraph 2.26.6, field strength measurements at these frequencies cannot be determined with any accuracy and in any case are irrelevant at the power levels in use. Therefore reference to 'take suitable precautions' in Paragraph 2.26.6 becomes impossible!

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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 unless the guidance contains the following; a clear definition of callsign usage within the modulation protocol in use and the maximum interval of 15 minutes for callsign transmission should be retained. It is important for this clause to enforce identification using the same modulation protocol that is being used for communications.

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 - To remove any possible uncertainty I recommend that Ofcom should revert to the very clear mandatory licence conditions that prevailed for all of the latter part of the 20th century.

This was to mandate the use of M, for Scotland, W, for Wales, I, for Northern Ireland, D for The Isle of Man, J, for Jersey and U, for Guernsey. The mandatory secondary locator shall be used on all occasions to clearly identify the location of the transmitter no matter where in the UK the licensee normally resided. The introduction of additional regional and special event prefixes and optional usage has caused considerable confusion within the UK and abroad I would also strongly recommend the total abolition of all other secondary prefixes except M, W, I, D, J and U. The current press reports that there probably be a K prefix for Cornwall demonstrates that Ofcom have lost control of the situation and is subject to pressure from small minority groupings seeking 'vanity' callsigns.

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 - This proposal is not acceptable. All UK amateur licence classes should be treated in the same manner and all should use a mandatory secondary locators to clearly and unambiguously identify the location of the transmitter.

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?:

No, I do not see that this is ever a valid case for encryption of amateur transmissions. Therefore clause 2.97.2 should be removed. If RAYNET are supporting a User Service concerned with safety of life there is never any need for message confidentiality!