

**Title:**

Mr

**Forename:**

John

**Surname:**

Rogers

**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?:**

Yes, but not as proposed.

I definately agree that these bands should be included in the full licences, but think this should be in exactly the same basis as other bands to which we have access to on a secondary basis.

In summary, I believe the standard wording applicatble to the other amateur bands only should apply: ie

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

the UK"

Furthermore, if the clauses remain as proposed, they risk setting precedents which if applied to other bands would radically change specific aspects of amateur radio in the UK as well as ambiguity and possible loopholes for more RFI pollution of the airwaves.

I disagree with para 2.26.3 wording "may not cause interference to or claim protection from other electronic equipment" because this is ambiguous and implies to me that we can suffer any kind of interference from or complaint from owners of bad equipment unreasonably without having any grounds for complaint ourselves. This will lower technical standards and could be a loophole unscrupulous manufacturers (eg PLT, or worse in the future!) can use to cause more polluting interference. This is also not in accordance with OFCOM's policy of not investigating interference to non-radio equipment.

Also 2.26.6 is unnecessary because a) the measurements are difficult to determine with any accuracy b) irrelevant at the small power levels allowed c) less relevant at the LF frequencies involved. Clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not need reinforcing.

I think clause 2.27.3 is unnecessary. The height does not necessarily give an advantage to the radiation pattern of an antenna. Limiting its height is unnecessarily restrictive, applies to a minority of licencees, and again is a precedent in the conditions..

Therefore in conclusion, my view is that the phrase "or electronic equipment" in 2.26.3 should be omitted , and 2.26.6 and 2.27.3 should be omitted in their entirety as unnecessary.

**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 as proposed.

A clear definition of callsign usage at the current maximum interval of 15 minutes should at the least be retained. It is my personal belief that 10 minutes maximum would be better, as we often wait around wondering who it is!

The standard convention of giving the distant call first, and station call last, should be retained, or confusion or mistakes can arise if conditions are poor.

The call should be in the same modulation as the transmission, but should be allowed to be sent by other modes (eg morse) in addition to giving it in the same modulation

**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. I disagree.

I do not believe the current mandated and widely accepted practice of call identification based on locations should be changed. The UK with its use of GM, MM, GU, prefixes etc. to show location area has one of the best systems in my opinion.

Any change of the practice of nearly all stations having regional secondary locators depending on their location will lead to confusion and problems both nationally and internationally. To change this would do away with more than 50 years of practice widely understood and accepted throughout the world as the best system.

Where countries have done away with this system (eg USA) it has caused misinformation as to general location, confusion, arguments and more problems than it has solved.

I cannot see any problem or confusion with a changing RSL prefix, plus appropriate suffix, as all it means that the station is at a different location. His callsign is still clearly identifiable.

**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?:**

Yes

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

Yes