

Title:

Mr

Forename:

Stewart

Surname:

Rolfe

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

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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. I feel the wording is suitable as it is at present

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?:

I strongly disagree with the proposal to make the use of Regional Secondary Locators optional.

RSLs have been used and understood by the vast majority of active HF operators for many decades and have been crucial in identifying the UK DXCC entity of operation. Removing them or making them voluntary will cause confusion and added complexity particularly with foreign amateur operators and to overseas organisations such as contest organisers and awards like DXCC, and is at odds with your claim that it will have "a positive impact on other Radio Amateurs, particularly those operating in other countries.." In my view this would have a negative impact on the way UK operators are identified while producing very little or nothing in the way of benefits. Furthermore these concerns were forcefully conveyed en masse to your colleagues at the Ofcom open forum meeting at the RSGB Convention last year, and I'm surprised and dismayed that this proposal is still being considered in spite of the logic and passion of the counter arguments produced (apparently unanimously) from the floor of that meeting.

I see no confusion with the way clause 2(2) is worded. I do though see ambiguities in your

proposal; for example I can't see from the wording whether I would be at liberty to use GW0ETF while operating in Scotland, England or other UK entity, and if so whether I would be obliged to use M/GW0ETF etc to avoid ambiguity. The whole thing would introduce confusion where at present there is very little and I urge you to drop this proposal and retain Clause 2(2) in its present form.

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 - see response 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?:

No opinion