

Title:

Mr

Forename:

Andrew

Surname:

Rowland-stuart

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?:

Not as Ofcom proposes. I agree that these bands should be made generally available to full licence holders but I believe that these should be subject to the same conditions as apply to other bands which are available on a secondary basis. It is unreasonable to provide protection to all electronic equipment. It is also unreasonable not to provide protection from any other electronic device whether it is a legal or illegal device in terms of electromagnetic compatibility. I also have concerns that these proposed changes could form a precedent for possible future licence revisions affecting other bands.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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?:

The proposal is ill-defined and meaningless in terms of how the words 'as frequently as is practical' should be interpreted so no, I do not agree. There is nothing wrong, as far as I can see, with the existing requirements. Amateurs need to be reasonably satisfied that they are not in communication with a non-licensed person. Under the proposals, which could lead to much longer periods before a call sign is given, this could be difficult to achieve. The existing arrangement works well and does not require changing.

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, most definitely not. There is no uncertainty in the minds of radio amateurs as stated in the question; only, it seems, in the minds of Ofcom as to how the call sign should be used. It has been the case that for the last 50 years the identifier used has referred to where the transmitter is operated and not where the main station address is located. To change this would affect contests and award programmes worldwide and would add a high level of confusion where none currently exists. It should not be left to amateurs to decide whether

they use a RSL or not. The licence conditions should require the use of a RSL which reflects the location of the transmitter as is currently the case.

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, absolutely not. Licence classes should be treated in exactly the same way. The RSL used by holders of intermediate licences should, as in the case of other licence classes, indicate the location of the transmitter and not the main station address.

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. But, I would point out that these provisions (clauses 1(2) and 1(3)) of the licence apply to all radio amateurs and not just to Raynet. The consultation document talks only about Raynet operations. There are other groups using these provisions including the network of 4x4 Response organisations which include many licensed amateurs in their organisations using amateur radio as an important communications method. These changes should not, therefore, refer specifically to Raynet but should continue to apply to all radio amateurs.