

Title:

Mr

Forename:

Andrew

Surname:

Scott

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:

I support the intention to create clarity and, where appropriate, simplify the legislation. There are a few areas where the intended simplification may, however, create practical problems in the future.

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?:

Supported in principle, but NOT as set out in the proposal. I agree with the principles of incorporation but references to a non-interference basis must be on the same terms as the existing schedules, applying rules for use on a secondary basis.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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. This will create a simplified route in the event of death of the named holder, and avoid further anguish to the deceased's family.

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 - the term is superfluous so long as Ofcom retain the rights and process of revocation.

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?:

Yes. The proposals naturally permits more frequent identification and, whilst radio amateurs should pursue 'best practice' in this aspect, the precise periodicity of identification need not be mandated.

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 - the existing provisions are quite adequate and more beneficial to the user community.

There may be a requirement to relax RSL application to mobile data stations (such as digital voice or APRS), but except for these, a Regional Secondary Locator indicating the location of operation is more beneficial to the community.

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. Consistent provisions with regard to Regional Secondary Locators should be applied across all classes of licence.

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. The additional clarity is welcome.

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

Yes. The changes provide a basis for improved service levels to User Services and may remove some obstacles currently limiting the deployment of Raynet and self-training.