

Title:

Mr

Forename:

George

Surname:

Smith

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?:

As RSGB: I agree that the bands should be made available to all Full Licencees but 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"

Furthermore some of the proposed clauses set concerning precedents that if subsequently

applied to other bands would radically change specific aspects of amateur radio in the UK. Of particular concern is Paragraph 2.26.6, which should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3

With respect to Paragraph 2.26.6, near-field measurements at these frequencies are very difficult to determine with any accuracy and in any case are irrelevant at the power levels in use. Clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not need to be reinforced in relation to the 472kHz entry.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

I agree.

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'?:

I agree.

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?:

Partially agree. I think some form of reminder be sent out post expiry and a period of grace of 3 months to one year allowed. It is far too easy to fail to remember the re-validation date or to be incapable of renewing near the time due to social upheaval, holiday or hospitalisation.

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?:

No opinion

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: as RSGB i.e. not as proposed.

A clear use of callsign at a maximum interval of 15-minutes should be retained. The station must be clearly identifiable. and be given in the same form of modulation in use at the time.

I would like to see the return of the requirement to provide identification at the end of a period of transmission or at the point of relinquishment of the operating frequency.

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: as RSGB - there is no need to change current mandated and widely accepted practice. Any change of current practice will lead to both confusion and disruption both nationally and internationally. To do otherwise would do away with more than 50 years of practice.

I feel that the RSL should always reflect the location of the transmitter irrespective of the source of modulation.

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: as RSGB - All call sign classes should be treated in the same way by retaining the current clause in respect of the call sign prefix. Again I feel that the RSL should always reflect the location of the transmitter irrespective of the source of modulation.

I do feel that foreign visitors should use the G prefix for full, the 2E prefix for intermediate equivalent and that novices should not be permitted unsupervised operational privileges.

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?:

I agree: But, have the CEPT conditions well separated from the other sub clauses such as a clause 2(4).

When operating abroad, any Intermediate licensee would automatically use his own home prefix and RSL.

Clause 9(3): I think that the use of radio within privately operated aircraft or hot air balloons should be permitted. This only with the full authorisation from the pilot.

It should not be permitted from within commercial flights.

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

Agree.