

Title:

Mr

Forename:

Graham

Surname:

Smith G3zod

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?:

No - not as proposed. In addition to the RSGB response (which I agree with), the part that says "the station must not cause interference to ... or electronic equipment." is ludicrous - for example, someone could build a simplistic one-transistor receiver and then force a licensed amateur radio station operating in compliance with their license to stop transmitting etc. etc. - this is completely unreasonable.

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club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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, absolutely not. 15 minute identifications is a perfectly reasonable requirement that can be easily accomplished by a person or software in the case of some digital modes.

For this reason, the proposed change adds no flexibility and in fact causes us problems as we need to be able to identify stations (as presumably Ofcom do if monitoring) for the purposes of day-to-day operating and on some occasions so that we can identify a station that is causing interference or other issues.

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 No No. Contrary to what is written in the consultation document, mandatory use of a regional suffix when operating within a region has been in use for around 70 years (possibly longer) and the vast majority of the amateur radio community understands this requirement. Please don't assume that the odd person failing to understand this point means that the amateur community in general doesn't - if they understand it, of course they will never have asked you about it!

Mandatory use of a regional prefix when operating from within a region is an extremely important to us:

- If we hear a callsign such as "GD3QQQ" we (and Ofcom if they are monitoring) know for certain that the operation is taking place from the Isle of Man.
- The identification of the operating region from a callsign is extremely important to amateur radio operators inside and outside the UK because these are treated as separate entities for the purposes of amateur radio awards, contests, and other activities internationally.
- For the above reason, amateur radio software (of which I am an author) needs to be able to determine the region reliably from the callsign - we can't do this if the mandatory link between prefixes and regions of operation is removed.

Perhaps the wording needs to be changed to remove Ofcom's perceived ambiguity and state that use of a regional prefix appropriate to the region operating is taking place from is mandatory (as it always has been).

On a related point, we have a similar issue with GB special event callsigns, but these of course are relatively rare. Rather than causing chaos to us as detailed in proposal/question 6, Ofcom can instead help by ceasing issuing GB callsigns and issue regional special event callsigns instead, such as GM100RSGB.

Additionally, the allocation of the RSL 'K' to the county Cornwall in 2014 does not fit in with any understanding of the RSL scheme. (Additionally, if every county wants their own RSL, there are simply not enough letters to go around - having issued one, Ofcom has set a precedent!) This allocation is not supported by the majority of the amateur radio community and should be revoked.

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. The reply to question 7 applies here; the regional prefix appropriate to the region that operating is taking place from must always be used, and this applies equally to Foundation, Intermediate, and Full licensees.

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 have no opinion on this.

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

I have no opinion on this.