Title:

Mr

Forename:

Michael

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?:

'No - Not in this form. While I agree that the bands should be made available to all Full Licencees, this should be 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 Schedule1 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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:

Yes, I agree with this proposal.

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?:

This could be removed. 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, I agree.

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 definitely disagree with this proposal.

A clear definition of callsign usage and the current maximum interval of 15-minutes should definitely be retained.

However the requirements that a station must be clearly identifiable at all times and that the identity be given in a format consistent with the modulation in use are supported (but that specific terms such as voice or Morse Code should not be used).'

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 - I definitely and strongly disagree with this proposal. This should not be changed.

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, widely understood throughout the world and would create far more confusion than is currently alleged to exist'

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 - I definitely and strongly disagree with this proposal

All call sign classes should be treated in the same way by retaining the current clause in respect of the callsign prefix'

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?:

I am unsure about this, so I will say NO. As Colin Redwood mentioned: "Even if there is genuine need to encrypt some messages, then there must be an explicit statement that requires station identification in the clear (un-encrypted). Without the specific requirement to identify in the clear, the use of the amateur bands by un-licensed operators would be undetectable and potentially be a cover for all sorts of illegal activities by criminals, terrorists etc. The suspicion of such activity could result in additional queries from licenced amateurs to Ofcom and additional investigations by Ofcom."