

**Title:**

Mr

**Forename:**

Michael

**Surname:**

Stevens

**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?:**

In principle, yes. However, there should be no need to make the requirements for these bands any different to other bands whether primary or secondary. In particular, the clauses about non-interference to other electronic equipment (RF equipment or not) and about the control of field strengths. This is very difficult to do at these frequencies and probably beyond the capabilities of most amateurs.

It would seem sensible, therefore, to allocate these bands in the same way as all the other bands are with the same requirements.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**

Definitely, 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. The question would be if the revocation was permanent or for a defined time.

**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. There might after all be some extenuating circumstances.

**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, not in its present form. To avoid confusion and misunderstanding, the present system should be retained. It is not onerous and is what has been in practice for many years. We should all be proud of our callsigns and not ashamed to use them. If we are not, then maybe we are doing something we should not be! Another reason for their regular transmission. Obviously, we should be sensible about the mode currently in use, but as these are all well known, there should not be any issue with using the same mode for the callsign transmission.

**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, not in its present form. The use of RSLs has been the norm for many years (perhaps over 80) and is globally expected and understood. It is an indication of where the transmission is being made from rather than the main station address. I don't see any net benefit in changing the system that is almost totally used within the UK and which is widely understood

elsewhere. I fear that if adopted, it may create more misunderstanding. Also see Q8 answer below.

**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, not in its present form. I see no reason to distinguish between the intermediate licence and the other classes when using callsigns. It is perhaps unfortunate that the intermediate callsigns for England included the 'E' as that is a different form to the other two. Perhaps the 'E' should be omitted in which case it could be treated exactly as the others. However, that may now be difficult to achieve.

**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?:**

Not being active in RAYNET operation, I cannot answer.