

Title:

Mr

Forename:

Andrew

Surname:

Stevenson

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:

IMO airborne use should be allowed under the license. I realise you are not covering that in this consultation (and its probably a legal quagmire) but I think it should be addressed at some point so I'm taking this opportunity to mention it :-)

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?:

Yes

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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. I agree this will have no immediate impact on fees and any changes the powers that we wish for in the future will happen regardless so the wording may as well be consistent.

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 amateur service should be able to do the correct thing without it being spelt out and this may be beneficial for future modes where call signs can be given in sub channels etc.

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?:

Yes. Given what you say in 2.68 was your intentions then 2(2) is clearly confusing. That said if you simply removed the clause then it would read to me the end of using the RSL at all as 17(1)(ee) would appear to rely on it.

Perhaps the best thing would be for Ofcom to actually spell out exactly what they mean and put that in the license.

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?:

Yes. It appears to be the only course of action to cope with licenses already issued and the law as it stands.

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?:

Yes. The role of amateur radio in emergency communication is probably shrinking as other communication systems become more reliable and ubiquitous. It still has some unique properties however and for the benefit of society as a whole these should be allowed to be used as often as needed.

I do wonder if the definition of the user services should be expanded to catch public service events that aren't necessarily emergency oriented (but are non-profit and for the benefit of the public). This would be to ensure there are enough practise opportunities to keep people trained, without having to stretch any definitions. That may be a bit off topic for this question however.