

Title:

Mr

Forename:

Edwin

Surname:

Taylor

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?:

Yes. However, the additional conditions contained in paragraphs 2.26.3 and 2.26.6 are not appropriate. This former appears to be a new requirement, and means that any interference caused to poorly designed or faulty equipment will potentially be the responsibility of the radio amateur, involving activities which he cannot reasonably be expected to undertake. The latter requires a measurement which professional engineers find difficult, is not required for other amateur bands specified in the licence, is pointless at the low power levels allowed, and whose intent is covered adequately elsewhere in the licence.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

Yes.

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. There is no uncertainty in the wording as it stands -- so perhaps assertions by a few misguided amateurs have apparently created a nonexistent problem. The current system reflects custom and practice (as well as the legal requirement) as it has existed since licences were reinstated after World War 2. The various regions within the UK licensing scheme are each aware of the status which they hold, and the possibility of (for example) a station operating from England appearing to be located in Guernsey would undoubtedly be viewed as absurd. Regional Secondary Locators are the basis of understanding around the world, and any change would cause widespread upheaval and confusion. The requirement to use them correctly at all times must stay. The only potential relaxation which would be welcomed would allow the alternative RSLs relating to club licences, specified in Note (c) to the

licence, to be used optionally by all Full Licensees -- they also indicate the region specifically, and are additionally well-known worldwide.

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. This really does introduce an element of confusion, and means the identification requirements of the Intermediate Licence would be radically different from the other two licence levels. The current system is well understood, and (as with question 7) needs no change, or at most a minimal clarification in the licence document.

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.