

Title:

Mr

Forename:

Julian

Surname:

Thompson

Representing:

Email:

What additional details do you want to keep confidential?:

Keep organisation confidential

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:

Generally this document is ambiguously worded and has no bearing on the reality of what is at stake. Two separate CONDOCs are needed for Q1 and the other administrative questions that have no bearing on the underlying Q1 issues.

Wildlife must be conserved when considering existing use below the lowest shared band (470kHz). More research is needed to decide the exact point where radio waves interfere adversely with wildlife such as Bats. For each indigenous species, the 'exact point' where that might occur will differ between each geographical area. Bats for example often rely on caves for their habitat. It will also differ between each EU country where regulatory decisions are made on sharing radio frequencies.

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. Interpretation of "non radio equipment" is critical and ambiguously worded. More research is needed at the lower end (below 470kHz) Ofcom must find out whether wildlife will be adversely affected in particular regions of the UK. For each indigenous species, the 'exact point' where radio waves interfere adversely with wildlife such as Bats is not known. Study should be updated by Fisher, Jess and Francis, Jessica (2005) The Bats of Britain: Study of Bat echolocation in the radio frequency range 18kHz upwards, University of Bristol <http://www.bio.bris.ac.uk/research/bats/britishbats/>

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

No. I disagree. There is no need to change best practices. Otherwise Ofcom is at risk of propagating confusion and disruption both nationally and internationally.

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':

No. I disagree. There is no need to change best practices. Otherwise Ofcom is at risk of propagating confusion and disruption both nationally and internationally.

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?:

No. I disagree. There is no need to change best practices. Otherwise Ofcom is at risk of propagating confusion and disruption both nationally and internationally.

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?:

No. I disagree. There is no need to change best practices. Otherwise Ofcom is at risk of propagating confusion and disruption both nationally and internationally.

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 disagree. There is no need to change best practices. Otherwise Ofcom is at risk of propagating confusion and disruption both nationally and internationally.

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 disagree. There is no need to change best practices. Otherwise Ofcom is at risk of propagating confusion and disruption both nationally and internationally.

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 disagree. Ofcom should retain the current clause in respect of the callsign prefix. Unnecessary taxpayer's expense should be avoided if the change is purely administrative. All call sign classes should be treated in the same way to avoid inconsistent treatment between each class of license.

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?:

No. I disagree. There is no need to change best practices. Otherwise Ofcom is at risk of propagating confusion and disruption both nationally and internationally.

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

No. I disagree. There is no need to change best practices. Otherwise Ofcom is at risk of propagating confusion and disruption both nationally and internationally.