

Title:

Mr

Forename:

Robert

Surname:

Tickle

Representing:

Self

Organisation (if applicable):

and Pitsford School Rodio Club

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:

This is a duplicate. I typed in my email address incorrectly on my first response

I have also clarified certain points.

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?:

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:

Totally agree. Even a very simple request to change the holder of a club call-sign from one person to another, where both parties are in full agreement to the move is overly complex. It currently requires endless form filling, an authorising letter from the current holder and a £20 handling fee!

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??:

Agreed on the basis that Ofcom start taking action against offenders of the WT Act whether or not they currently hold a licence since anyone can purchase transmitting equipment.

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 this permits greater flexibility if one forgets to revalidate or has other issues with the process.

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?:

Seems reasonable. OFCOM can choose to start charging, with or without this change. This just tidies up the wording.

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 as proposed. A clear definition of callsign usage and the current maximum interval of 15-minutes should 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 - 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'

The following is clear and could be reinstated.

(1) Whenever the Station is used the call sign mentioned on the first page of this Licence shall be transmitted: Provided that when the Station is used -

(a) at an address other than the main address the Licensee shall, in order to indicate the country or place of use, vary the prefix letter to the call sign by using the prefix letter(s) appropriate to that country or place, being G for England, GM for Scotland, GW for Wales, GI for Northern Ireland, GC for the Channel Islands and GD for the Isle of Man:

(b) at the temporary premises the suffix "/A" shall be added to the call sign

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(c) at the temporary location the suffix "/P" shall be added to the call sign.

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?:

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?:

.90 - might need to clarify what "in any aircraft or an airborne vehicle" means.... there are some people out there using 2m sets (illegally) while paragliding. They are not "in a vehicle", they are suspended beneath one. If someone was licenced and was paragliding would they be able to argue they weren't "in an airborne vehicle". I know what the intention of the clause is, but I'd like it if it was clearer.

Might be better to say "use when in the air is prohibited".

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

The situation of a user service handing a Raynet group a previously encrypted message for transmission has been known and accepted for a long time. We checked it out with Ofcom some years ago. To me this clarifies it. The transmission callsign is identified, but the amateur has not encrypted the transmission.

Make it clear that all Amateurs may transmit messages when requested by approved user services, or sub agencies working for those user services. Transmissions must be within bands and power levels associated with the licence level of the Amateur. It's as simple as that. If we have a national or local emergency Amateurs should not feel in anyway constrained by their licence, other than bands and power.