

Title:

Mr

Forename:

Nicholas

Surname:

Totterdell

Representing:

Self

Organisation (if applicable):

G4FAL

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:

On the whole, the proposals are sensible. However the proposals to remove the requirement to use appropriate regional prefixes is causing consternation in the UK amateur fraternity. Regional prefixes identify the country or entity from which a radio amateur is operating - SP is Poland, DL is Germany, etc. The UK prefixes, GM, GJ, GU, GW, GD, G, and occasionally GZ for Shetland, are internationally known and recognised. These prefixes are particularly important in the context of international (DX) operation and in competition. The international amateur radio community want to be able to identify the country of operation immediately on initial (CQ) call. Please do not change the existing wording of UK licences in the area of regional prefixes.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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 - I am aware of a case where this would have been an extremely valuable arrangement - please proceed

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, I fundamentally disagree with this proposal. There is currently no uncertainty amongst Radio Amateur licensees about the use of RSLs and there never has been. Amateur radio is an international hobby. It is very important that the country from which a

radio amateur is operating can be derived from the prefix with which they are operating. Please do not change the existing wording as this is completely understood and complied with in its current form.

The suffix of a callsign is unique and therefore the Main station callsign can easily be derived. Additionally, web sites such as QRZ.com are often used to explain that the use of the regional prefix is temporary and to direct any related correspondence (QSL cards, etc.) to the Main station address and callsign.

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, again I fundamentally disagree with this proposal.

Amateur radio is an international hobby. It is very important that the country from which a radio amateur is operating can be derived from the prefix with which they are operating. Please do not change the existing wording as this is completely understood and complied with in its current form.

The suffix of a callsign is unique and therefore the Main station callsign can easily be derived. Additionally, web sites such as QRZ.com are often used to explain that the use of the regional prefix is temporary and to direct any related correspondence (QSL cards, etc.) to the Main station address and callsign.

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 - I agree with this clarification and the use under of CEPT of reciprocal licences.

A future provision for amateur radio operation from private aircraft, balloons, gliders, etc. would be welcomed.

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

Yes