

**Title:**

Mr

**Forename:**

Stephen

**Surname:**

Townsley

**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?:**

None

**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 I am confused by term 2.26.3 regarding claiming &quot;protection&quot;. I find the wording non-specific and unsatisfactory. I am not aware of any special protection radio amateurs claim other than the responsibilities laid out in their licenses.

Section 2.26.6 is ill-defined. Amateurs often work in 'public' places. There are already heath

and safety requirements on amateurs. I think this change is either meaningless or has an ill-defined assumption behind it somewhere.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**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

However I have an NOV for a club license. It seems to me that changing the call sign ownership should require the club committee to authorise this in writing or the NOV holder to notify Ofcom of the change.

**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?:**

No.

This seems ill thought out. Mentioning specific modes causes a problem. For example repeaters use automated morse identifiers but are voice repeaters. The implication is that all repeaters using voice should not use morse identifiers. There are other examples all over amateur radio.

Appropriate identification needs to be used but this does not necessarily have to be in a specifically defined communications mode.

**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.

The current system works well and is understood. I don't see that this can improve amateur radio or is a regulatory burden.

**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 is a major change of definition. The secondary locator has been an indicator of the country where an amateur is operating at the point a transmission is made. It would be more confusing if it only applied to the home address as, if the amateur was mobile, it would not be clear which country he/she was operating from.

What would happen to an amateur from the Isle of Man operating in Scotland? His callsign would be confusing for almost everyone.

RSLs now are clearly defined and no change is necessary.

**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.

There is a certain inconsistency here but this provision would seem to have more inconsistency. Intermediate licences being treated differently to other classes. The proposal outlined in 2.80 would seem a better solution to the perceived issue.

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

Yes.

This seems to be a sensible amendment.