

Title:

Mr

Forename:

Tim

Surname:

Trew

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?:

I agree with the principle, but believe that clause 2.26.3 should be reworded to "The station must not cause interference to, and may not claim protection from, devices demonstrably meeting the requirements of applicable ISO/CEN/CENELEC/ETSI EMC immunity standards",

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circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

I agree.

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'?:

I agree.

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?:

I agree.

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?:

I agree.

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?:

I disagree. The current wording does not require "that a call sign is transmitted at precise intervals", it just requires that it is within 15mins, not "at 15mins intervals". The new wording is more ambiguous: "a valid call sign for the station be transmitted as frequently as is practicable" could reasonably be interpreted as "once an over", which is not your intent. Additionally, the mode used for identification could be restricted - for instance, some DSTAR operators in the US believe that sending their callsign as data is sufficient, since it will be displayed on most receivers, even if this is not visible to a mobile operator. Therefore, I believe that, if the operating mode contains a speech component, the callsign should be sent as speech.

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?:

I disagree. Making the use of RSLs optional is confusing for those seeking specific countries or using the RSL to ascertain the likely bearing to the other station.

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?:

I agree, but, as for Q7, this should apply to all levels 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?:

I agree.

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

I agree.