

**Title:**

Mr

**Forename:**

Peter

**Surname:**

Walker

**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:**

Errors brought about by OFCOM administration should be corrected. The licence should not be changed to accommodate the errors.

**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 do not agree with the proposal

While in principle I am happy to have the 470 KHz and 5 MHz bands included in the full licence, I am not happy with the terms proposed.

2.26.3 "The station must not cause interference to, and may not claim protection from, other

wireless telegraphy or electronic equipment." This is totally unacceptable.

Electronic equipment must have a certain level of immunity to RF interference, and must not itself cause undue interference to wireless telegraphy services. Inclusion of this condition will be seen as undermining the EU EMC Directive.

This also contradicts OFCOM's statement in paragraph 2.1 of the consultation:-

"OFCOM is under a statutory duty to secure optimal use for wireless telegraphy of the electromagnetic spectrum"

2.26.6 It is not reasonable (or practical) to measure "near field" RF fields with respect to exposure levels to such an accuracy to claim compliance with government guidelines. The power levels proposed in the change will also mean the "near field" RF fields will be negligible with respect to the advice from the Health Protection Agency.

Sufficient guidance is already contained within the licensing document to give confidence in reducing the risk of RF exposure to acceptable.

It is better to give practical advice and guidelines to ensure all risks are reduced to a minimum. Such information is also included in Amateur Radio training for the various licence classes.

2.27.8 b This is not required or desirable. It is important that any station identifies itself at frequent periods during operation.

I agree just "listening" on a "net" does not require an identifier to be sent, but any transmissions should be identifiable to a station at frequent intervals.

**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 with the proposal.

**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 with the proposal.

**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 with the proposal.

**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 with the proposal.

**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 do not agree with this proposal

2.61 The statement "be transmitted as frequently as is practicable" is ambiguous and open to misinterpretation. This could result in the requirement to send station identifiers much more frequently than the present requirement of every 15mins.

The current requirement to send a station identifier every 15 mins (minimum) is satisfactory, and fulfils the requirement "that a station must be clearly identifiable at all times".

Any reference to specific "modes" of transmission of station identifiers will also create confusion, and could be detrimental being "clearly identifiable at all times". Using a modulation method in keeping with the modulation in use is appropriate.

**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 do not agree with this proposal

The confusion has come about due to OFCOM's inconsistency with licence documentation. No License should have a regional locator (RSL) contained on it. All UK Licences are UK Licences! Documentation should be amended to reflect this error.

The RSL should be applied depending upon the location of the station at the time of operation.

2.69 "In our view, if used, an RSL should describe the location of the main station address." This view (if implemented) would put the whole of the amateur Radio community, around the world, into a state of confusion.

As per the current practice, and widely (internationally) accepted convention, a UK station SHOULD identify its region of operation (where the transmitter is located) with the relevant regional locator.

This would be in keeping with the requirement "a station must be clearly identifiable at all times"

Also from 2.39 of the consultation document "Misleading identities are expressly prohibited by the Radio Regulations<sup>26</sup>. " Using a RSL of a different region to the region being operated from can be viewed as very misleading.

Any change to current practice (to use the regional locator of the region that station is operating in), will cause widespread confusion, both in the UK and around the world to all aspects of the amateur radio community.

It would be impossible to identify which UK region a station was operating from!

Virtually every international award program, contest, and "contact logging" software would be compromised, and need re-defining.

**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 do not agree with this proposal

All licence classes should be treated in the same way, except if a "technical" reason dictates otherwise.

As already outlined in the consultation document:-

"call signs we issue with an Intermediate Licence are in the format 20aaa or 21aaa43, which is the call sign that appears on the licence."

"in some cases, Intermediate Licences have been issued with a country identifier already inserted into the call sign."

It is an OFCOM administrative error that has caused this issue and the error should be corrected, not the licence changed to suit the error!

The second character should be the "RSL" of the region of station operation. As per Q7 the Licence should not contain any "RSL", but an instruction to insert the correct "RSL" depending on the region of operation.

**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 with the proposal

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

I agree with the proposal