

Title:

Mr

Forename:

John

Surname:

Wayman

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?:

No. I do agree that the bands should be made available to all Full Licensees, 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 would establish worrying 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, as well as the phrase 'electronic equipment' in 2.26.3

With respect to Paragraph 2.26.6, clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not need to be specifically 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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

Yes, I do.

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 do not feel that I am in a position to provide a reasoned judgement on this question, since I do not know what constitutes 'an offence under the WT Act'. I therefore have no means of assessing whether this proposed change is onerous, fair, or otherwise.

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, I do.

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?:

No. As far as I can tell, it makes no difference to me whether the clause reflects the Ofcom 'standard' format. I would therefore prefer the clause to be unchanged, since it has been proven to function. With any change to a legal document, there is always a risk of unforeseen consequences arising from any change, however apparently innocuous.

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. 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. I have no experience personally of myself or any of my radio amateur acquaintances suffering confusion of the kind referred to in the consultation document. Any change of current practice will lead to genuine confusion and disruption both nationally and internationally. The current practice, as enshrined in licence documents for more than 50 years, is widely understood throughout the world and the changes proposed would create far more confusion than is currently alleged to exist. I believe that an appropriate RSL should always be used to denote the location of the station at the time of operation and not its main address.

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. All classes of licensee should be treated in the identical manner. There should be no difference between the way an Intermediate licensee is required to identify and the way Foundation and Full licencees are required to identify. The proposed changes would introduce precisely such a difference and, as far as I can tell, would benefit no-one. My recommendation is to retain 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?:

No. In my experience, there has never been any confusion arising from these two clauses. I would therefore prefer the clauses to remain unchanged, since they have been proven to function. With any change to a legal document, there is always a risk of unforeseen consequences arising from any change, however apparently innocuous.

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

Yes, I do.