

Title:

Mr

Forename:

Alastair

Surname:

Weller

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:

Intermediate license holder, 2E0IAW

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 - Not as proposed. I believe that the bands should be made available to all licensees with power restrictions varying per class 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 ie:

"Secondary. Available on the basis of non-interference to other services inside and outside

the UK"

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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'?:

No I disagree.

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?:

No I disagree. License revalidation is an obligation of the licensee. Ofcom should instead ensure revocation operating processes are able to meet the demands of the license (ie by automatically revoking the license and subsequently notifying the licensee at their last known address). However licensees subject to this process should then be able to re license at their previous class (or new equivalent) by taking the appropriate examination directly.

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 I disagree. Amateur licensing should remain free for those licensing electronically (or by any other medium that may be introduced in the future in order to reduce administrative burden) whilst an administration charge can (and should) be levied for those completing paper applications.

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 - Not as proposed. 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 I disagree. The RSLs and suffixes noted in section 2.64 do not cause the issues that are noted in 2.65 but rather serve a purpose in identifying the operating location and type of station. With regards to 2.69 it is clear from the license documentation (Clause 13.1) that RSL identifiers and suffixes should be used when identifying the station. In addition, licenses that have incorrectly been issued with RSLs in place should be replaced by a correctly issued license.

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 I disagree - All call sign classes should be treated in the same way by retaining the current clause in respect of the callsign prefix. Regional identifiers should be used to identify the current operating location rather than main station address. Licenses should be reissued, by enforced revalidation, to remove any regional identifiers.

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 not as proposed. Whilst I do not disagree with removing unnecessary complications from the license, I do not believe that the current clauses are ambiguous. With regards to 2.89 the definition of "at sea" is required as definitions of "maritime mobile" use the phrase "at sea". I agree with the proposal of 2.91

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

No not as proposed. Variations to clause 11(2) should ensure all amateurs are able to offer this service outside of the operation of RAYNET. Whilst encryption may be necessary for the transmission of secure messages, all encryption should be undertaken by the user service so that license holders are not encrypting messages and the current wording of clause 11(2) still applies.