

Title:

Dr

Forename:

Robert

Surname:

Whelan

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:

I think it worth considering that although a regulatory framework is needed for the amateur service because the radio spectrum is a scarce and valuable resource shared between a number of users, the amateur radio service is one which encourages individuals to learn, experiment and innovate. Therefore any regulatory framework should be flexible enough to allow space for such innovation to flourish. After all 'experimentation should precede regulation'

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 proposal to include the inclusion of the 470kHz and 5MHz in the Full licence. I do not agree with the inclusion of the specific terms applicable to the 470kHz and 5MHz being incorporated into the new licence without qualification which makes it clear that such terms apply only to the two bands being incorporated and not to the bands in the current licence. For example the inclusion of the statement that protection be afforded to 'general electronic equipment' which presumably should not be capable of being affected by electromagnetic radiation of the type produced by radio amateurs anyway

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?: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

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 do not agree with this proposal. The current arrangement is very effective.

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 strongly object to this change. The uncertainty in RSL usage Ofcom alleges is grossly overstated. Further it has been the radio amateur practice to use RSLs to remove ambiguity as to

the region/country the station is operating from. The removal of the need to use recognised regional identifiers will cause confusion and will bring approbation on Ofcom and damage its reputation amongst the international radio amateur community. The status quo should be retained.

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?:

The callsign structure assigned to Intermediate licencees is anomalous. Might it not be better to change to a new structure which is consistent with Foundation and Full callsign structures.

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?:

Possibly but will need careful wording

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

No comment