Title:

Please select

Forename:

Ian

Surname:

White

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 declare that I am also represented by the RSGB, and endorse the Society's formal response.

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?:

In principle, Yes; but I OPPOSE the block importation of the additional conditions as proposed.

Some of these conditions might have been appropriate in the original NoV (reflecting its experimental nature) but will no longer be appropriate when 470kHz and 5MHz become 'mainstream' bands.

In particular, the proposed clauses 2.26.3 and 2.26.6 should be deleted because:
(a) those issues are already covered elsewhere in the licence;
(b) 2.26.3 is seriously defective - it includes all equipment without qualification, even that which fails to comply with applicable Emissions and Immunity Requirements;
(c) 2.26.6 is covered in the Schedule to the existing licence.

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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?: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

Yes.

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.

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?:

Yes

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. Identification is a case where a clear mandatory framework is required.

It is essential that licensees themselves are completely clear about what is required of them; and also so that listeners can immediately understand whether or not the transmitting station is complying.

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, for the following reasons:

1. OFCOM seriously overestimates the level of uncertainty that currently exists. Our radio club has taught the present regulations to children and to adults diagnosed with learning difficulties, with no problems whatever. The final sentence of paragraph 2.70 is exactly contrary to reality; because -

2. OFCOM has now been made aware of the vastly greater worldwide uncertainty that would be created in the amateur radio community by making RSLs optional.

3. So great would be uncertainty caused to listeners in other countries that OFCOM could stand accused of facilitating the transmission of misleading messages, in direct breach of to the UK's obligations under Art.19.2 of the ITU Radio Regulations.

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 - once again the harm (confusion) caused by the change would outweigh the claimed need or benefit.

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?:

Yes.

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

Yes.