

Title:

Mr

Forename:

Lawrence

Surname:

Woolf

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:

Special event callsign using the GB prefix do not identify the country being operated from. I suggest that this could be changed, outside England. to using a prefix such as GBW or GBJ if a 3 character prefix is permissible unless there is a better option.

An apparent error in the wording of the license is on page 13 section (oo) where countries outside the UK seem to be identified as being in the UK. I understand that the correct term for the complete area for which the licences are administered is the "British Islands" which is defined in the Interpretation act 1978. Alternatively it could say "UK and Crown Dependencies".

Dear Sir,

I have already submitted my response to the Consultation Paper on Amateur Radio licensing. I would like to add some more details for you to consider as some of them were not covered in the paper.

I would like to see a correction to section (oo) on page 13 of the license. This gives an incorrect meaning to the United Kingdom which consists of Great Britain and Northern Ireland. The Isle of Man and the Bailiwicks of Guernsey and Jersey are the Crown Dependencies which are not part of the UK. I understand that the correct term to use is the British Islands as defined in the Interpretation Act 1978.

According to Section 5 of the Interpretation Act 1978 - "British Islands" means the United Kingdom, the Channel Islands and the Isle of Man. This definition is distinct from that of the British Isles that is geographic and includes the Republic of Ireland. From the Act of Union on 1 January 1801 until 6 December 1922, the island of Ireland was part of the United Kingdom of Great Britain and Ireland. As far as I know the Crown Dependencies have never been part of the United Kingdom. As I live in Jersey the term British Islands is used on my passport.

Perhaps the definition of the areas covered by the Ofcom licenses given near the top of the first page of the license could also be improved as it could be interpreted in more than one way and suggests that the Crown Dependencies are part of the UK.

Since the Consultation Paper was published I have heard that the prefix GK is likely to be available to Radio Amateurs in Cornwall. This sounds like a very good idea as anything that gives more information about where a station is located is useful. Most of my operation is now on the VHF and UHF bands and hearing that prefix would allow me to point my antennas in that direction. It would also be useful for other regions of England to have their own regional identifiers, maybe GL for London, although they would have to be for groups of counties otherwise there would not be enough remaining letters. Also it would not be helpful to allow us to use our home station prefix when operating in other countries or areas covered by the license.

It is always considered important for the prefix of the callsign to indicate which country, or part of the country, that the station is operating from. One exception to this is the GB prefix as used for special event stations, beacons and repeaters. In my opinion this should be improved in order to remove the confusion. One possibility would be to use a 3 letter prefix, if that is permissible, such as GBW or GBM or GBJ or GBK etc.

Best wishes, Lawrence Woolf GJ3RAX

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?:

Yes

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

The present requirements are OK

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

Removing the need to change the RSL would lead to confusion as to the country that the station is operating in.

A better system would be to identify which country the station is operating from and also the home country if different.

If I visit England the just changing my RSL does not identify where I normally live. A better solution would be to us G/GJ3RAX which would make both clear. That would be much better than the equivalent CEPT use which would be to prefix the callsign with M/- which could be confused with operating mobile.

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

It is important for most of us to know which country the station is operating in. It would be an additional advantage to give both that country and the home country such as G/2W0ABC.

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