

Title:

Mr

Forename:

David

Surname:

Wressell

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

Keep organisation confidential

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?:

Yes with conditions - The bands should be included but as per other secondary use bands (ie. "Secondary. Available on the basis of non-interference to other services inside and outside the UK").

Also, remove reference to Electronic Devices - This has always been 'Wireless Telegraphy Equipment'. to broadly include 'Electronic Devices' will cause many problems, and will set a precedent to vary the conditions on the other bands, thus would dramatically change Amateur Radio within the UK.

Also, with reference to exposure to RF (2.26.6), these measurements are very difficult to make without specialised equipment. This should be removed as any Full Licencee should know about the hazards of RF and should be taking precautions 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of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

Agreed.

Furthermore, the Club Licence could be linked to a specific role within the club's management (eg. Chairman/Secretary), so that the licence remains with the named individual within a role, and when that role is taken by another person, the licence moves to that person if possible (or to another management role if not - eg. person new to role is foundation or Intermediate licence holder only).

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 - If someone is convicted for breach of WT Act, they should have their personal licence revoked. The wording of the licence could then change to include 'd) anyone who has had a licence refused or revoked by Ofcom' or similar. This would eliminate the problem of a 'disqualified person' from being barred to operate under someone else's call, but can operate under their own.

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 - The licence should reflect the actual process, though the 'grace period' should be defined, so that a failure to contact Ofcom within xx weeks of the notice will mean the licence is revoked.

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?:

Agreed

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 limit of 15 minutes should be retained, but the emphasis should remain on the station being clearly identified at all times. Remove specific modes (voice, Morse etc.) and stick to "a format consistent with the modulation in use"

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 - The current system does not need changing. To do so would lead to confusion Worldwide from the accepted use of RSL's.

Another way of using RSL's would be to adopt the method used in other countries, but putting the country prefix prior to the callsign with the main station location RSL (ie. in France, I would use F/M0WDG). If i were to go to Scotland, I would then use GM/M0WDG. A Scottish Amateur visiting England would use G/GM1ABC, or visiting Wales would use GW/GM1ABC. This retains the Main Callsign by which the amateur is known by, but uses RSL's to identify their location. This would make more sense to me, but again, this could upset the understanding worldwide of a known system.

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 - Treat All callsigns the same way.

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 - It should be made clearer

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

I agree that the changes should be made to allow RAYNET to do things like speak to non-amateur stations and use encryption if required, however I do believe that it should be in the form of an NOV available to all class of licence, as the inclusion in the main licence may lead to some amateurs seeing this as a way of giving their equipment to a non-licenced person and chatting to them. The NOV could request information to ensure that the applicant is a member of RAYNET (ie. their group number or membership munber). The NOV route would mean that those that required it could utilise the requirement, but those who wouldnt use it would not have that entitlement.

Also the licence should be made clearer that an amateur operating for RAYNET may give equipment to members of the user service for unsupervised use (eg. MRT) for the duration of the Exercise/Operation requested for, and that the requirements for station identification

should be relaxed in this case (the identification for the Exercise/Operation with the controllers callsign should suffice to cover all user service non-amateur stations - amateur stations still identify as per usual).

I personally was not clear that I could give a piece of Amateur equipment to a user service for unsupervised use - I understood that they could use my equipment directly, but I had to be with them. This needs clarifying in the licence (or NOV as I have suggested).