

Title:

Dr

Forename:

Patrick

Surname:

Xavier Mw0xap

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:

Additional Comment on Schedule

Changes (Ofcom Question-1)

Question-1

of the Ofcom amateur licence consultation proposes to copy the existing clauses from the 472kHz and 5MHz NoVs into the main licence

RSGB believe there may be simpler ways of doing this than proposed, but in particular recognise that there are serious concerns being expressed by members in particular regarding proposals 2.26.3 and 2.26.6 relating to the 472kHz band:-

2.26.3: The station must not cause interference to, and may not claim protection from, other wireless telegraphy

or electronic equipment.

RSGB shares concerns regarding the EMC implications of this requirement. The other

proposed clauses could in any case be catered for by a standard secondary allocation in the frequency schedule.

2.26.6:

The licensee

must take

suitable precautions, particularly in locations to which people have access, to minimise the risks associated with exposure to Radio Frequency ("RF") radiation.

Advice concerning safe levels of exposure to RF radiation is provided by the Health Protection Agency.

RSGB shares concerns that this represents

a compulsory RadHaz condition. Furthermore

we believe 2.26.6 may not be necessary as Schedule-1 of the licence conditions already has a similar, but advisory, item as per Note-e below (though that note needs to be updated in any case as the HPA no longer exists)

For information, the current Schedule-1 note (e) is:-

(e) In all frequency bands, high intensities of radio frequency radiation may be harmful and safety precautions should be taken. Advice concerning safe levels of exposure to radio frequency radiation is provided by the Health Protection Agency

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; good idea; a simplification. Also, I support the RSGB's view above; I've copied and pasted it verbatim.

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?:

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'?:

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?:

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?:

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?:

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?:

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?:

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?:

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