

Spectrum Framework Review

Consultation questions

Q1: Are there any other major medium- to long-term spectrum management issues that this review should be considering? Are there any other significant technological or market developments that this review should be aware of when developing its thinking?

Answer. - No.

Who would have thought 100 years ago that this matter would even be considered today. We have had internationally agreed spectrum management ever since the Berlin Convention of 1908. The London Convention of 1912 introduced important rules affecting international maritime safety.

A negative ion storm could wipe out satellite communications world-wide and a fall back position would be vital.

Q2: Do you believe it is useful to publish a compendium of issues? How frequently should it be published? What information should be included?

Answer –Yes. “Issues” are matters for all who have an interest not just for the administrators. Ofcom cannot abrogate their responsibilities to ALL spectrum users.

Minority users such as radio amateurs and short wave listeners have a right to be consulted and their views taken seriously.

Q3: Are there any other issues of sufficient significance to merit mention in this document?

Answer - Yes. The Ofcom Proposals do not consider seriously the case for the Licensed Radio Amateur using the bands for experimentation.

Do not forget that Marconi termed himself a radio amateur.

Ofcom seem to want to rip up 100 years of Internationally agreed Frequency Bands & procedures which have served both industry and amateurs well.

Radio Amateur Licences should be treated with the same importance as commercial users.

I consider that Radio Amateurs would not mind if the Licence Issuing Office was transferred from the SSL to another authorised body or to the RSGB. Radio Amateurs are very concerned that Ofcom is effectively washing their hands of their Licensing responsibility. The Ofcom overview & control **MUST** be maintained.

There needs to be an effective authority to prevent "Pirate Transmitters" operating in Amateur Radio allocated International frequencies or for that matter, any frequency that the "Pirate" wishes to operate on. Failure to monitor the spectrum will lead to abuse of the entire spectrum. Once the word gets around that Ofcom do not care or have the Staff to find & prosecute "Pirates", the airwaves will be awash with them.

The idea of issuing the Amateur Radio Foundation Licence was very sensible. It enabled radio newcomers of all ages and abilities as well as disillusioned CB operators to become Licensed Radio Amateurs after learning how to operate a transmitter without causing interference to others. It also taught the M3 Radio Amateur how to handle RF power with safety and provided a minimum technical requirement of competence, which might lead to a career in radio electronics.

We strongly believe that the current approved training and a worthwhile written tests that have to be passed before an operator is granted a licence to transmit on the Amateur Radio Bands should be maintained NOT diluted.

We do not believe that Public Service Broadcasting should take over the frequency occupied currently by Citizens Band Radio. Putting wideband powerful transmitters there, at the top end of the band allocated to Amateurs may cause interference to Amateur Radio. Better to let Amateurs take over the frequencies.

Ofcom should not be cavalier with the Re-Allocation of Primary Allocated Users Frequencies, e.g. 24Ghz. To trample over Primary Users shows that Ofcom at present do not have the technical expertise to carry out any of the Proposals indicated in this document.

Q4: Are there important lessons to be learnt from experience in other countries that is not addressed here?

Answer - Yes. Ofcom are quoting examples, which are totally unrepresentative of the high density, close proximity of radio users in the UK & to Europe.

To quote Australia for example is simply useless as it has high-density users in coastal towns & cities many hundreds or even thousands of miles apart. For example what happens in Perth may not affect any nearby (by Australian measures) City.

Please remember that radio frequencies are capable of becoming as congested as our roads. Careful INTERNATIONAL allocation of the spectrum is VITAL.

Q5: Do you agree with Ofcom's intent to maximise the use of trading and liberalisation?

Answer - No.

Q6: Are there other areas, apart from those identified above, where trading and liberalisation should be restricted? Are there areas identified above where you believe the trading and liberalisation could be fully implemented?

The answer to Q5 is not only no but is NO NO NO. As such the answer to these questions is also NO.

Ofcom MUST understand that amateur radio, especially when operated by former professionals, has played an important role in emergencies over many years. Amateurs have picked up distress calls, they formed the entire emergency communications network in New York on September 11th and also in the tsunami this year.

TRADING and LIBERALISATION will render such vital assistance in times of emergency impossible.

Q7: Do you agree with Ofcom's approach to providing spectrum for licence-exempt use?

Answer - No.

The airwaves are not a commercial product where lumps can be sold off for commercial gain.

What is required is the internationally agreed spectrum allocation with all commercial users paying a licence fee for the use of defined areas.

Ofcom need to consider their international obligations under the agreements reached.

Ofcom cannot be allowed to make up its own rules for a matter which affects every country in the world. The radio frequency spectrum is not a parochial matter.

Q8: Is Ofcom's proposed methodology to estimate the amount of spectrum provided for licence-exempt use likely to deliver the right results?

Answer - No. As with the answer to previous questions we consider the basic concept to be totally misguided, as such the methodology is not required.

Q9: What is the appropriate timing and frequency bands for making available any additional spectrum needed for licence-exempt use?

This assumes agreement with the licence exempt concept and we do not agree with it as can be seen above. In any event the question does not seem to make sense.

Perhaps one needs to look at frequencies used by government at present and seeing what use they could be put to remembering that they may be needed in the future.

Q10: Do you agree with Ofcom's longer-term proposals for spectrum trading?

Answer - No.

Ofcom do not have, we believe, the authority to tear-up Internationally Agreed Frequency Allocations.

Ofcom has little or no experience in such matters having only been in existence for a VERY short period.

Longer term proposals should not be made without lengthy and deep consideration and proper consultation with users.

Q11: Is the approach set out here, and in Annex H, for developing technology-neutral spectrum usage rights appropriate? Are there alternatives?

Answer No.

Of course here are always alternatives -

but do Ofcom have the right to meddle with International agreements?

Q12: Should Ofcom do more to resolve interference?

Of course they should. When Ofcom came into existence it seems that the role in resolving interference and monitoring the spectrum disappeared. Monitoring and policing are vital.

Q13: To what extent should Ofcom intervene in promoting innovation?

Answer - Ofcom should not intervene at all. Ofcom does not have or should ever have the expertise to intervene with innovation.

Ofcom should respond to requests regarding innovation sympathetically.

Q14: Do you agree with Ofcom's proposed approach to harmonisation?

Answer- No.

What could be more harmonised than the current international agreements which have worked well for over 100 years.

Ofcom appear not to agree with existing International Standards or Frequency Allocations.

Ofcom should be encouraging even more International co-operation.

Q15: Can you foresee any problems with the proposed approach to harmonisation other than those listed above?

There are problems galore we need an international approach not a parochial one. If we have the Ofcom "go it alone approach" it will be a little like the airlines abandoning English as the international language – the whole air traffic control system would fail with catastrophic results.

Ofcom seems not to know the meaning of the word "harmonisation".

Q16: Do you agree with Ofcom's proposal to continue with division by frequency as the primary method of dividing the spectrum?

Answer - Yes. This is the only way of doing it – indeed it is the international way of doing it.

Q17: Is Ofcom's approach of not Intervening to mandate entitlements in time appropriate?

Answer – It is not appropriate for Ofcom to wash their hands of existing proven procedures. To rush into wide band cognitive radio systems is not wise as they will raise the noise floor & cause more trouble in the future for everyone.

Cognitive systems which simply listening using wide-band aerial systems will never indicate that someone is receiving a weak signal on a directive aerial from afar & to have some transmitter pop up and blast away for minutes or even hours and then disappears is totally unacceptable.

We are quite happy for cognitive radio systems to be allocated blocks of frequency spectrum for them to operate in, as they will be competing with each other & have the mechanism to mutually continue transmissions without causing interference to each other.

They could be given frequency spectrum mutually agreed for release by the MOD. Iwe are sure that there are huge chunks of frequency spectrum allocated to the MOD during WWII & The Cold War era that have not been used for years, indeed the equipment produced to use these frequencies have long ago been withdrawn from use.

Q18: Do you agree with the RIA?

Answer - No. It seems an idea of raising money for the Treasury. The sale of spectrum for 3G produced a silly amount of money, which will never be recouped & caused a number of good companies to virtually, or completely fail. It seemed to an outsider as though the bidders were using Monopoly Money at a Dutch Auction – it is doubtful that companies will be foolish enough to do this again..

The Radio Officers Association represents 350 serving or former Radio Officers who operated on the maritime frequencies from on board ships, at coast stations or were employed at GCHQ. Half the membership hold amateur radio licences and form the radio society.

As users of the spectrum as both professionals and amateurs we consider that our experience should contribute to this debate. We feel strongly that we had to work to international regulations drawn up at the Wireless Conventions held every four years. We see the approach of Ofcom as one which could bring chaos to the spectrum and wreck the good running of the communications systems which have been in operation and regularly updated for over 100 years.

End of Submission.