

## OFCOM Spectrum Framework Review Document The Response from the British Amateur Television Club

*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?*

Amateur Television has been part of the wide spectrum of amateur radio activities enjoyed in the UK since 1948. We have been experimenting with Digital Amateur television for the past five years. We need to be assured that our investment in equipment to do this will not be wasted by the frequencies currently available to us being withdrawn under some scheme of rearrangement which fails to value the importance of the “self training aspect” of amateur radio and television

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

Quarterly on your website

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

Other responses from groups representing the Amateur Radio stakeholders give plenty of answers to this question and we agree with them all

*Q.4 Are there important lessons to be learnt from experience in other countries that is not addressed here?*

Amateur radio must continue to have a licensing method that enables management and interference control to be maintained.

*Q.5 Do you agree with OFCOM's intent to maximize the use of trading and liberalization?*

Not if it affects the present and future allocations available to the amateur radio services across all of the radio spectrum.

*Q.6 Are there other areas, apart from those identified above, where trading and liberalization should be restricted? Are there areas identified above where you believe the trading and liberalization could be fully implemented?*

NO

*Q.7 Do you agree with OFCOM's approach to providing spectrum for licence-exempt use?*

Not if it will impact negatively with the present activities of the thousands of radio and television amateurs presently using the allocated frequencies – especially those in the microwave parts of the spectrum

*Q8. Is OFCOM's proposed methodology to estimate the amount of spectrum provided for license-exempt use likely to deliver the right results?*

No.

*Q.9 What is the appropriate timing and frequency bands for making available any additional spectrum needed for license-exempt use?*

No comment.

*Q.10 Do you agree with OFCOM's longer term proposals for spectrum trading?*

No

*Q.11 Is the approach set out here, and in Annex H, for developing technology-neutral spectrum usage rights appropriate? Are there alternatives?*

Technology-neutral is a concept that needs clearer explanation to be readily understood by the majority of stakeholders.

*Q12. Should OFCOM do more to resolve interference?*

Yes., although the amateur radio movement has self regulated itself for some years this self regulation cannot work in the complete absence of any enforcement from the Regulatory body. LIGHT TOUCH must not be equal to NO TOUCH

*Q.13 To what extent should OFCOM intervene in promoting innovation?*

By all means that do NOT reduce the role or activities of amateur radio where most innovation has taken place in the past and is currently

*Q.14 Do you agree with OFCOM's proposed approach to harmonization?*

OFCOM must ensure that our "rules" stay in accordance with the spirit and the letter of the Radio Regulations of the ITU

*Q.15 Can you foresee any problems with the proposed approach to harmonization other than those listed above?*

See our answer to Q.14.

*Q.16. Do you agree with OFCOM's proposal to continue with division by frequency as the primary method of dividing the spectrum?*

Yes.

*Q.17 Is OFCOM's approach of not intervening to mandate entitlements in time appropriate?*

Only where there are single band owners and no sharing by secondary users is taking place

*Q.18 Do you agree with the RIA?*

We have no evidence but we doubt that this correctly values the overall investments already made by radio and television amateurs nor of their contribution to the economy and technical success of our nation.