

Responses to specific 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?

No comment as far as Amateur Radio is concerned.

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

Yes – Quarterly. Everything likely to impact upon any existing users of spectrum especially where in our case Radio Amateurs are concerned.

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

See attached submission.

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

One or two European countries have rejected some wideband proposals already, due to interference with essential communication services.

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

Amateur Radio is not a commercial activity and its allocations should be left out of trading arrangements.

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?

So long as the Amateur spectrum is left out and see Note 3 in the main body of the submission.

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

Yes so long as there are no interference issues with the amateur service.

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

Not for radio amateurs to comment upon.

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

Not for radio amateurs to comment Unless they impinge upon our allocations.

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

Provided the amateur allocations are excluded - no comment.

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

Providing that as stated in the Spectrum Framework Review “at the same time neither reducing the efficiency with which spectrum is used or the interference suffered by others.”

Q12: Should Ofcom do more to resolve interference?

Having set the framework, Ofcom must be responsible for resolving any systematic interference resulting from approved systems. This we believe is OFCOM's prima facie task.

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

It is not Ofcom's function to promote innovation but to deal positively in an independent and unbiased way with any problems arising in frequency spectrum allocations etc.

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

As far as Amateur Radio is concerned, International harmonisation is necessary right across the spectrum. (See Note 2).

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

It has been the experience of the Radio Amateur community that, as by its very nature RF transmissions do not recognise international boundaries, even into the GHz part of the spectrum. Therefore It is essential that harmonisation of the use of the frequency spectrum is paramount. This must involve international agreement.

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

Yes.

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

Not applicable to amateur radio as far as I can see.

Q18: Do you agree with the RIA?

No –I consider harmonisation to be an essential feature of Ofcom's spectrum management. Our geographical position deems it absolutely necessary to consult with our European neighbours. Otherwise it will descend into chaos

Main body of submission

Amateur Radio is an International, regulated, science based hobby which offers many advantages to our country. Some of these are educational, some social and some lead to work opportunities. In return for achieving qualifications that assure their competence, radio amateurs are given the privilege of access to small segments of the spectrum. Many amateurs have the ability to be able to design, build and test equipment that, whilst not type approved, is non-the-less, state of the art. This applies particularly in the microwave region of the spectrum, where cutting edge developments are being achieved.

There is a very clear and necessary distinction between Radio Amateurs and other users of the spectrum. Clause 1 Paragraph 1 of the UK amateur radio licence states:

“The Licensee shall use the station for the purposes of self-training in communication by radio telecommunications which includes technical investigations.”

Contrary to popular belief, there is still a strong element of the amateur fraternity, many of whom are in this country, pushing the technological envelope and achieving what would, until very recently, have been thought impossible to achieve. My interest in amateur radio started when I was 10. It gave me the drive, interest and experience to carry it on into my working life as a radio officer and is still a very important part of my life now that I am retired.

This country has drawn upon this pool of knowledge for the industrial, military and intelligence fields in communication for decades. Although more reliance is now placed upon satellite communications rather than terrestrial, this does not make this knowledge base any less useful. The ease with which satellite based communications can be destroyed in any future conflict make it imperative that we maintain an alternative communications method and the means to maintain and operate it.

A vibrant amateur radio community is essential to maintain this vital pool of knowledge. I believe that the present privileges should be maintained right across the frequency Spectrum. It is the wide range of activities that encompass Amateur Radio that ultimately leads to new developments in communications. This resource will continue to require allocations especially in the microwave region on all our present bands.

The proposed UWB bands are of considerable concern. Much of the current work done by amateurs in the microwave region is limited by the noise floor. Any further degradation of this will have a considerable impact upon the ability to communicate at these frequencies. It is worth noting that some of the current bands allocated to radio astronomy are adjacent to amateur bands and have been able to rely upon these amateur segments to act as guard bands for their own low signal level work.

It is difficult not to draw the conclusion that UWB may be introduced due to economic factors rather than technical common sense. There may well be a need for considerable frequency band allocations for UWB but much careful work could be put a risk if the wrong choices are made.

To re-enforce an earlier point, much of the work currently carried out in the field of vhf/uhf/microwave satellite technology at Surrey University is by amateur operators in their professional capacity as satellite system experts. It is this 'empathy' with their chosen field that amateur radio enthusiasts can bring to their work that makes the effort and associated costs in retaining their current spectrum privileges worthwhile.

As long as an enforceable licensing system remains in place, it will be within Ofcom's ability to control the way the radio spectrum is used. Changes of use can be authorised and put into place to allow for changes in the way we live and the way technology develops. Once that licensing system is removed, the widespread use of licence free equipment that follows could not be withdrawn and 'Pandora's Box' will be well and truly open. We are currently going to some lengths to control environmental pollution and to attempt to correct past mistakes. Lets not find ourselves in the same position with spectrum pollution in a few years time.