

E-mail submission

CHIPPENHAM & DISTRICT AMATEUR RADIO CLUB
G3VRE

(Founded 1966 – RSGB Affiliated)

SPECTRUM FRAMEWORK REVIEW – Consultation

Please find enclosed our Consultation response, supporting statement and signed petition. The petition represents approximately 48% of club membership, which at present stands at 24.

The deregulation of the hobby throws up many issues and may have a significant affect on its present status. Over the last few years we have already seen significant changes within the hobby: dropping of the morse requirement; merging of licence class A and B, the introduction of the successful Foundation licence and internet linking, etc. There are some hard working people within the hobby, promoting it as well as tutoring our new comers. We must not forget those that have now and in the past enjoyed the element of construction and experimentation, thus adding further to the enjoyment of the hobby for themselves and others and even benefiting commercial activities.

This proposal has not considered the numerous hard working clubs and individuals now involved with amateur radio training courses; why should they give their time in doing this when just around the corner is licence free entry to the hobby? Having Ofcom as a governing body gives Amateur Radio nationally recognised status, a degree of control and order. Deregulation we perceive, will remove protection for amateur frequencies, which will pave the way for other radio users; such will put pressure and threaten particularly our VHF/UHF and microwave allocations. We do appreciate that Radio Spectrum is precious and has a commercial value and that many wireless applications are clamouring for frequencies. What you intimate is that Amateur Licensing is no longer cost-effective for you to administer, but is at no fault of the radio amateur.

We are concerned that deregulation will have an adverse impact and that Ofcom is not making a distinction between Amateur Radio and other services, e.g. CB users or leisure maritime. We feel that Ofcom is now only interested in the economics of the Radio Spectrum and view Amateur Licensing has a non-profitable affair, in this market-led economy of ours. There may be other ways of managing the licensing, e.g. 10-year licences. Ofcom and the former RA have not increased licence fees for many years, probably now giving rise to its disproportionate costs, perhaps a failing on their behalf. The lack of a realistic licence increases is through no fault of the individual radio amateur. Over/2

We see only recently that science such as Chemistry are being taught less, we do not want to lose one of the breeding ground for future radio and electronic engineers – something this country is all to short of – by the same token.

There are many issues, which may affect proposals: -

- Loss of amateur frequency allocations/and current privileges

- Loss of enjoyment of a truly fascinating hobby.
- Loss of the self-training aspect of the hobby
- Influx of abusers and loss of the basic discipline of communications
- Loss of the ability to build and construct transmitting equipment – loss of small traders dealing in kits and components, if moving toward Type Approval
- Loss of redress of complaints procedures in dealing with EMC problems and the possible increase in EMC complaints due to lack of technical knowledge.
- Introduction of Type Approved equipment
- Loss of the Regulating body
- Increasing interference to our narrow band/weak signal users
- Loss of ability to provide communications for User Services and Government Office Resilience Teams
- Not having a replacement governing/administrative body in place.

These are just a few issues that we have been discussing and give us concern about the future status of the hobby.

At present the hobby is much more accessible than it was 10 years ago and the existing regime seems to work well, it is no longer just a hobby for the few.

We ask Ofcom to look in greater depth at the issues that arise from deregulation of Amateur Radio and its effects within and without its domain. We wish these views to be considered as part of the consultation as we see deregulation as a detrimental move.

Andrew Scott-Green
Chairman

The Spectrum Framework Review Consultation

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?

Not able to comment as far as Amateur Radio is concerned, but wish to point out that a this SFR, which seeks consultation on how to decide how the spectrum should be managed apparently acknowledges that issues may not have been identified. We put forward a counter problem - How competent has the authors' research been?

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 in our case including Radio Amateurs. Previous annotated frequency tables have, amongst other things, given rise to the voluntary Band Plans adopted within the amateur community. We see no problems with a comprehensive frequency table.

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

See attached supporting statement.

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

Not aware of any at present although there have been some worrying proposals for inappropriate technologies such as PLT. The information given in Annex G has apparently been drawn from a 31 page background document that was one of two documents submitted for an I.T.U. conference in February 2004, the full report of which has not yet been published. Without all relevant information it is difficult to comment.

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. The document acknowledges in Table 4,1 that there is an operational need for harmonisation on an international basis for amateur bands and that operation below 30MHz will also need international cooperation. There is some concern that sporadic long distance propagation has not been included as a comment in that table and that the table glosses over Amateur allocations in the GHz area. Accordingly these questions do not seem relevant to most amateur frequencies. However, concerns will exist in the GHz ranges and frequencies in those areas that have, by international agreement, been allocated on a primary basis to the Amateur and Amateur Satellite services should NOT be liberalised.

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 of Trading Arrangements.

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. We cannot support the release of any frequencies, allocated to amateurs, for licence-exempt use.

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

We feel this is not for radio amateurs to comment.

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

We feel this is not for radio amateurs to comment.

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

Provided the amateur allocations are excluded. Market based spectrum management will not be suitable for amateur radio.

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." Research is still being conducted to see how use of, or the right to use, the electromagnetic spectrum by technology-neutral means can be achieved or even what it means.

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. We would welcome proactive monitoring of interference but are concerned that reactive means which will only be activated after licence holders have failed to agree may have financial implications for weaker players.

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

We feel that it is not Ofcom's function to promote innovation but to respond to it positively in an independent and unbiased way. Innovation must be applied equally for all users of the spectrum especially in allowing 'innovative use' licences, or similar. We wonder how unbiased intermediaries, should they be used, will be identified?

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

So far as Amateur Radio is concerned, International harmonisation can be shown to be 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 harmonisation is highly desirable as equipment, systems and signals frequently cross international boundaries. The conventional approach to harmonisation would be preferred by most amateurs. We are concerned that a previous liberalisation of interference standards, apparently to encourage technological developments that

have not become commercially viable, has unnecessarily degraded all standards. We do not wish to see any further degradation of those interference standards.

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?

This area is still being researched Not applicable to amateur radio so far as we are aware.

Q18: Do you agree with the RIA?

No – We consider harmonisation to be an essential feature of Ofcom's spectrum management (See also Note 4).

Supporting Statement

Amateur Radio is an International, regulated, science based hobby which offers a number of advantages to society including educational and social benefits. In return for achieving qualifications that assure their competence, radio amateurs are given the privilege of using various small segments of the spectrum with equipment that is not type approved and in many cases may have been designed and constructed by themselves. This is a very clear and necessary distinction between Radio Amateurs and other users of the spectrum such as Private Business Radio and Marine Radio users. Clause 1 Paragraph 1 of the UK amateur radio licence says *"The Licensee shall use the station for the purposes of self-training in communication by radio telecommunications which use (without limiting the generality of the foregoing) includes technical investigations.* For more information on amateur radio, a video has been prepared by the national society the Radio Society of Great Britain and this seven minute presentation can be viewed on-line if you have access to "broadband" at:- <http://www.essexamateurradio.org.uk/prehighpres.htm>

In order to maintain a vibrant amateur radio community it is essential that the present privileges are largely maintained right across the spectrum. The different aspects of amateur radio include:- self training to various levels, social and public service, educational and technical investigations which often lead to new developments in communications. (see Note 1). For such developments to continue allocations are required on all the present bands. Where rationalisation is needed amateurs could trade some spectrum for smaller, preferably exclusive and internationally co-ordinated bands in the interest of on-going developments by amateurs.

Many of the interesting investigations undertaken by amateurs involve weak signal modes. The assertion that “Amateur receivers already work in the presence of a degraded noise floor” is not true in the microwave spectrum proposed for UWB. Much work is being done at levels limited mainly by ground noise.

Proposals to allow "Cognitive access" to our frequencies would destroy our ability to do useful work of this kind. Cognitive mechanisms are unlikely to pay attention to our pre-existing low level signals and thus regard our allocations as clear to use.

With proposed Ultra Wide Band systems that raise the noise floor, the “Genie” will be out of the bottle and unable to be put back once such schemes are approved. The onus should be heavily placed on the commercial interests proposing such schemes to prove beyond reasonable doubt that they will not adversely effect other services.

Firm regulation is essential to amateur radio especially because of its experimental and self-training elements for which permission to use non “type approved” equipment is a vital part. If Ofcom wish to delegate this regulation it would make a great deal of sense to explore the possibility of getting the national society, the Radio Society of Great Britain to administer the amateur bands on their behalf in much the same way as the MoD manage their parts of the spectrum.

We see that Amateur Radio also has a role in Emergency Communications, working with the ‘user services’ and Government Office Resilience Departments – this aspect should not be overlooked. For further information please refer to <http://www.raynet-uk.net/>

There exists an acknowledged failure to encourage young people to migrate from education to science based careers. Several areas of scientific endeavour including developments in communications are beginning to suffer from a lack of qualified engineers. The regulatory impact assessment E.3 fails to address this shortcoming and this may eventually harm competitiveness. A healthy and expanding amateur radio community contains a pool of skills able to contribute to addressing this area of risk.

We have had some difficulty in coming to terms with a glossary of thirty words and expressions (used within the SFR) that have meanings sometimes devoid of either simple or plain English understandings. An example is the extent by which beauty contests can have a bearing on the management of the electro-magnetic spectrum. Amateurs have long been subject to requirements that forbid the use of secret codes and may find it difficult to suddenly contend with simple English words that have a meaning, fully understood only by a minority. Unfortunately, this long glossary only serves to make more difficult the advice RSGB can give to its members so that they can respond in an easy to understand fashion. We are also uncertain of the meaning of the true meaning of expressions such as ‘a light touch regulator’ and ‘technology-neutral spectrum’.

Note 1

A good, current, example of outstanding development in amateur radio is WSJT by Joe Taylor, a Nobel Physics Laureate (US call-sign K1JT). (See <http://pulsar.princeton.edu/~joe/K1JT/index.htm> for more details)

Note 2

Microwave bands do require international harmonisation because these frequencies are used for satellite and Earth-Moon-Earth communications on a worldwide basis. Also current UK microwave distance records for terrestrial operation are:- 1.3GHz - 2617Km, 2.3GHz - 1083Km, 3.4GHz - 980Km, 5.7GHz - 1244Km, 10GHz - 1275Km, 24GHz - 391Km, 47GHz - 203Km. Thus all these bands have the potential to cross international boundaries even from terrestrial stations. Indeed it is a fact that from the east and south coasts of the UK, international, cross border, propagation is a daily occurrence on the microwave bands.