

As I do not consider myself to be sufficiently knowledgeable in all of the subjects contained in the "Spectrum Revue" I have confined my comments to items specifically related to amateur radio.

*Q.1 Are there any other major-to long term spectrum management issues that this review should be considering ?*

*Are there any other significant technological or market developments that this revue should be aware of when developing its thinking?*

Response:

If licensing of amateur radio is discontinued or subject to a lighter form of licensing requirement, I consider it essential to retain some form of assessment as to the technical competence of those allowed access to the relevant portions of the spectrum.

The present license exempt sections of the spectrum such as the 446 MHz PMR band rely on the fact that commercially manufactured equipment must comply with fixed performance limits relating to Power, Frequency Stability, Harmonic Radiation etc to ensure that these parameters fall within acceptable limits.

Licensed amateur radio operators often construct their own equipment capable of operating at much higher power to that of PMR equipment therefore it is essential in the interests of reducing interference to other spectrum users such as essential services etc that operators of amateur radio equipment be fully aware of possible consequences of their actions in relation to potential interference problems.

Any restrictions placed on the use of home constructed equipment would be difficult to police and would tend to reduce innovation and technical contributions amateurs have made over the years.

*Q.3: Are there any other issues of sufficient significance to merit mention in this document ?*

Response:

The proposed use of power lines to distribute digital information is of particular concern to radio enthusiasts as the possible consequence of interference caused by this technique could render some of the current frequency allocations unusable.

It is interesting to note that the relevant authorities in Japan have decided not to proceed with power line distribution of digital signals following trials that resulted in unacceptable levels of interference to other spectrum users.

*Q.5: Do you agree with Ofcoms intent to maximise the use of trading and liberalisation ?*

Response:

Trading is inappropriate for amateurs who use the spectrum allocations purely for hobby and recreational activities.

Any proposals in respect to liberalisation must take into account the possible loss of control over existing restraints on the use of spectrum Allocations and the consequent risk of higher interference levels to other users.

*Q.7: Do you agree with Ofcoms approach to providing spectrum for licence-exempt use ?*

Response:

As stated in my response to Q.1. The provision of spectrum for licence free use-is acceptable providing that adequate control can be exercised over the performance parameters of equipment used, by virtue of built in design and manufacturing constraints.

In respect to amateur radio, I consider it essential that some form of assessment be made as to the technical competence of participants, which infers that such participants be subject to training and examination by an approved body. This would imply that some form of licensing be retained.

My fear is that without adequate control and restraints over the use of the frequency allocations to amateur radio overall standards will deteriorate to the detriment of all.