

Response to the Spectrum Framework Review

A consultation on Ofcom's views as to how radio spectrum should be managed.

I will confine my response to four specific areas, which have been raised within the consultative document.

1. Amateur Radio Licences

The proposal, which questions the need for an Amateur Radio Licence, (p28) is contradicted in the statement (p23) that there exists a need for international harmonisation.

The internationally allocated frequency bands used by Radio Amateurs cover the full range of the spectrum. Radio Amateurs regularly communicate with others in all countries. The frequencies used, quite often, will not be in the parts of the spectrum traditionally associated with worldwide communication. For example: through satellites dedicated to Amateur Radio communication or by Moon Bounce, the latter being a communication mode utilising extremely low signal strengths in the VHF, UHF and Microwave parts of the spectrum.

More consultation is required in this specific area to give Ofcom an understanding of the full range of Amateur Radio activity that will allow Ofcom to determine changes in Spectrum management that will not be detrimental to Amateur Radio licence holders (>60,000) in the UK.

2. Interference Levels

A reference is made (p39) to the transmissions from appliances such as Hair Driers. Legislation currently exists, based on European Directives that limit the levels of radiation in the spectrum that these appliances may issue.

It is a flawed argument to say that because these devices emit radiation, therefore it would be acceptable to allow in band, low-level transmissions to be made which would affect other services. This is particularly true in the case of the Amateur Radio bands. Most Amateur Radio communication takes place with low signal strength just above the noise floor. Any increase in this noise floor from other transmissions will have a detrimental effect on this service.

3. Spectrum Abuse

Spectrum abuse, and how it can be controlled, is not mentioned in the consultative document. The concept of a “light touch” approach is promoted, but only in the context of addressing interference. This, however, cannot address the serious misuse of the spectrum that regularly occurs, particularly in urban environments, by unauthorised users. Whilst its effect on some services may be dismissed as a simple nuisance, interference with the emergency services is life threatening. The definition of emergency services must include, in addition to the accepted three, Coast Guard, Mountain Rescue, Utility Services and all those that support them in times of emergency, and this includes Amateur Radio, at local, national and international level. Amateur Radio played a key communication role, particularly during the early stages, in the Tsunami disaster.

Proposals to address Spectrum Abuse **MUST** be brought into any review of the Spectrum.