Introduction

This response to the above Ofcom consultation document is from the Radio Society of Great Britain (RSGB, www.rsgb.org.uk) on behalf of its members and the wider Amateur Radio community. The latter includes both individual operators as well as a variety of special interest groups whose spectrum this document involves.

RSGB is recognised as one of the leading organisations in the world in the field of amateur radio. It collaborates with its fellow national societies via the International Amateur Radio Union (IARU) through IARU Region-1 (www.iaru-r1.org).

Amateur radio is a science based technical hobby enjoyed by over three million people worldwide. From a statutory point of view it is fully recognised by the International Telecommunication Union (ITU) as a service and is listed in the ITU Radio Regulations as the Amateur Service and the Amateur-Satellite Service.

Prior to this consultation over several years the Society has liaised with Ofcom on London-2012 matters with respect to both spectrum requirements/support and our own interests in regard to Special Event Stations, Amateur License Prefixes, RAYNET etc.

We envisage that a similar range of topics would be of interest with respect to Glasgow-2014.

In addition to this response, we would be pleased to continue such discussions, both with Ofcom, or any other stakeholder who has an interest in this topic.

Permission is granted for a copy of this response to be placed in the public domain.

RSGB, November 2012
**General**

The 2014 Commonwealth Games are a premier international event and inevitably need significant spectrum resources and equipment to facilitate broadcasting, security, press/media, officials etc. Whilst smaller in absolute terms, the games and the spectrum required has parallels to the recent 2012 London Olympics & Paralympics.

Many of the thirty consultation questions are specific to particular communities of interest, so instead below we provide a summary of topics relevant to amateur radio which we would be pleased to discuss further.

**Spectrum Related issues**

We would expect that spectrum demand for Glasgow-2014 would be less than London-2012 and that the consequent need for temporary use of amateur spectrum should be reduced.

However we are also conscious that the quantity of available spectrum to accommodate temporary demands from Glasgow-2014 PMR and Cameras is also likely to reduce by 2014 due to impending awards such as VHF 156MHz, the Digital TV Dividend, 2.6GHz, 2.3/3.4GHz release etc. We therefore remain concerned that there may be undue pressure on amateur allocations.

**VHF/UHF - PMR Issues**

For the 2012 Games we faced considerable demands on our 430 MHz UHF band and a late request on our Primary 144MHz band. It is important that assumptions and band planning undertaken to accommodate PMR for Glasgow-2014 should be clarified with us beforehand, so that we can advise on any local Amateur spectrum usage that may apply. Any request for such temporary use of amateur bands will require reasonable notice and will need to be specifically tailored based on:-

- Local circumstances
- Local repeater/gateway infrastructure
- Amateur radio contest schedules
- RAYNET simplex channels and talk-thru frequencies
- Relevant band plans at the time

For example for 2012 we were able to plan around the prior restrictions on UHF amateur use as a result of the London Charing Cross radius that affects 431-432MHz - which would not be applicable to this case.

**VHF/UHF – Repeaters, Satellites & RAYNET**

As the Ofcom document notes, it is possible that RAYNET may be involved in a supporting role. We would wish to minimise disturbance to their existing frequencies and likewise to any amateur satellite and repeater channels.

**Microwave Bands - Wireless Cameras**

It is likely that more cameras will be in Hi-Definition format (and maybe 3D or Ultra Hi-Def). We would advocate maximum use of fibre for these in the first instance. We would be especially concerned that early spectrum release in the 2.3 or 3.4GHz amateur bands may cause a capacity issue and thus affect more sensitive areas of amateur activities such as 2320 or 3400MHz.

**Wireless Telegraphy Interference Enforcement Regulations**

The Society and other respondents supported the temporary 2012 version of these. However they were introduced relatively late and with a differing time period and geographic definitions to other spectrum restrictions. We would look forward to more timely consideration and greater consistency in their definition, if introduced.
Test Events
Ofcom suggest these may not happen. However valuable lessons did occur in 2011/2 – with UHF Sailing telemetry/timing equipment for instance. Whilst experience has no doubt been gained, there remains a risk that new/untried equipment may cause unforeseen issues that might have been identified rather earlier.

Support to Ofcom - Venue Engineers
Should Ofcom again need to supplement its staff resource we would be pleased to consider such requests - as successfully occurred for the London Games.

Amateur Radio Operating & Cultural Events
The Commonwealth Games are a major sporting and cultural event. They are usually celebrated by amateur special event stations, including Manchester in 2002, and most recently in India in 2010.

The London-2012 Games was marked by a very high level of interest by amateur radio operators including:-
- Large numbers of requests for special callsign prefixes (by an online NoV which we automated )
- A popular ‘follow-the-torch’ award
- Several GB2012xx special event stations
- Two very popular flagship stations - 2O12L (2-Oscar-12L) and 2O12W (2-Oscar-12W)

Whilst details remain to be confirmed we envisage that amateur radio clubs and operators would again being interested in such activities for Glasgow-2014. We would be pleased to discuss such stations and callsign formats with Ofcom.

Summary
For both spectrum and special event issues we would be pleased to discuss the issues further with Ofcom so that both UK, overseas and visiting amateurs are fully aware of all arrangements and the result is a successful Glasgow-2014.

Reference
The scale of amateur radio related spectrum planning and operating for London-2012 led to us providing a dedicated set of web pages for news, guidance and reference papers, which may be of some assistance when considering Glasgow-2014:-