

Title:

Mr

Forename:

Robin

Surname:

Gape

Representing:

Self

Organisation (if applicable):

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

The Amateur Radio Service develops technical staff that UK plc needs for its success. The microwave bands in general, including the release and adjacent bands, are part of the ecology of self-development and achievement for Radio Amateurs, both collectively and as individual station operators.

Question 1: Do you agree that it is likely that the benefits to UK consumers and citizens will be greater from the MoD's release of spectrum in the 2.3 GHz and 3.4 GHz release bands than from retaining the current amateur use?:

This is an unreasonable question. The release bands are currently allocated on a secondary basis, meaning that Radio Amateurs are restricted in their operation in favour of the requirements of the primary user(s). radio Amateurs have a long history of responsible citizenship.

Question 2: Are there current uses in the release bands other than those detailed in RSGB's band plan and discussed in Section 3 of this consultation?:

Unknown.

Question 3: Are there further consequences of removing the release bands from amateur licences that have not been considered in our analysis?:

No comment

Question 4: There is an option (although not preferred) to remove access to the adjacent bands, as well as to the release bands. What are the consequences of removing access to the adjacent bands from amateur licences?:

The Amateur Radio Service has a long history as a pathway to valuable careers, both in Engineering and elsewhere. Removing the adjacent bands from the Amateur Radio Service in the UK will discourage future Radio Amateurs. That would leave UK plc in a weak position in the future. Radio Engineering knowledge will be more essential in future, not less.

Question 5: Are there current uses in the adjacent bands other than those detailed in the RSGB's band plan and discussed in Section 3?:

No comment

Question 6: Are there additional mitigation measures which would provide demonstrable proof that amateurs would not cause interference into LTE in the release bands following the release?:

Radio Amateurs are trained to be, and generally are, very responsible citizens. Interference may arise from either poor transmitting equipment or poor receiving equipment. Radio Amateurs do not capriciously cause interference to other spectrum users. Setting up an interference hot-line via the RSGB or the UK microwave group would be a sensible and pragmatic approach.

Question 7: Do you agree with the proposed process for varying licences following cases of reported interference and our proposal to vary licences should dealing with the number of reported cases become too onerous?:

No. There is a considerable investment in time, expertise, equipment and money to establish an Amateur Radio station. If and when there is an onerous level of interference from Radio Amateur operation in the adjacent bands, then the RSGB and UK microwave group can be relied upon to take a responsible approach. If an individual operator is not responsible, then that individual's licence may be withdrawn.

Question 8: Do you agree with our preferred option?:

Generally, yes. However, withdrawal of the spectrum would impact on international use of the adjacent bands by UK Radio Amateurs. That part of the proposal seems heavy-handed

and unnecessary, given that there is no experience, yet, of the operation of "Future Wireless Broadband" in the release bands.

Question 9: Are there additional changes to the Amateur Radio Licence which would assist amateur in lowering the risk of causing harmful interference to new uses?:

A Radio Amateur is already required to suspend operations if causing interference under licence condition 5(1)(b). When there has been real operational experience of the operation of "Future Wireless Broadband", then one may be able to give a more practical answer to the question.