

Title:

Mr

Forename:

Julian

Surname:

Smith

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:

I am a UK citizen and hold a UK Amateur Radio full license. I am also an active user of the frequency bands which are the subject of this consultation.

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?:

I accept that shared usage of the bands, between Amateur Radio and the potential new users, will be untenable. Radio Amateur operations are often weak signal working and the potential saturation coverage of the new users would preclude such operations. I also accept that the commercial case and wider public interest would not be served by possible interference from Amateur Radio transmission from within these bands.

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?:

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

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?:

I believe that the Amateur Radio service must retain some degree of access to frequencies adjacent to these released bands. This would support future Amateur Radio operations and experiments, which will expand understanding of equipment and propagation at these frequencies. Benefiting the Radio Amateurs and the wider community. Removing access to the adjacent bands would preclude all such experimentation in these frequency ranges.

I believe that such Radio Amateur operations can still successfully be conducted within the proposed frequency ranges of 2310-2350MHZ, 2390-2400MHZ and 3400-3410MHZ. And that the technical experience within the RA community is such, that operation in these adjacent bands can be conducted without undue interference to the new users.

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?:

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?:

There has been long term co-existence of Radio Amateurs and CAA radar in the 1300MHz frequency bands. The respect that the RA community have shown to avoid interference to this safety critical user, and cooperation to assist them by reporting issues with their own equipment, stands as testament to this.

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?:

I am concerned by the proposal that Amateur access from adjacent bands may be withdrawn based reports of interference, rather than actual interference.

Such a blanket revocation could potentially be triggered, by complaints which are as a result of faulty or poor design in the new user's equipment, or from sources unconnected with Amateur operations.

I believe that where Amateur stations are operating within the emission limits specified within their license, then that individual or wider Amateur community should not be penalised. And such limitations should only be as a result of proven interference.

Proven cases of undue interference from UK based Amateur transmissions have historically been very low. I see no evidence to suggest that the situation should be any different for these release bands.

In my view, the current process for investigating alleged interference from an Amateur station (section 5 of the Radio Amateur License Schedule), is perfectly adequate to deal with any potential situations.

So I do not agree that further clauses should be added to the Amateur Radio License.

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

I agree with the provision of access to the adjacent bands, by Amateur Radio.

However, I do not agree that additional clauses should be added to the license document to allow revocation at short notice.

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?:

The Amateurs actively using these areas of the spectrum are a close knit community, sharing knowledge and resources. Regularly meetings are held throughout the year where high-end test equipment is available to check the performance of equipment, and to seek advice from other Amateurs, who are often professional engineers specialising in that field.

In cases where an individual Amateur station were to have access to these bands limited or withdrawn, or be given notice that such action is being considered, the Amateur community as represented by the RGSB, could be requested by the licensee to assist in the investigation and mitigation of any real causes of interference.

Current comments on forums have suggested that the RSGB Microwave Group would be willing to discuss provision of such a service.