

Additional comments:

This is a wonderful opportunity to improve the existing adjacent sub-bands and relieve some of the congestion being experienced by many users.

Question 1: What future uses might this spectrum support:

146-148 I would like to see awarded to Amateur Radio operators to relieve congestion on the existing 2m band (especially for RAYNET groups).

154-156 could be used as valuable additional spectrum to the marine VHF users.

The remainder could be allocated to PMR users to help alleviate some of the congestion currently being experienced.

Question 2: What implications might these possible future uses have for the way in which this spectrum is configured in terms of transmit powers, bandwidth and geographic coverage? For example:

- **Could these possible future uses be accommodated under the existing Business Radio licence products? If so, would they need the channel widths of the existing Business Radio licence products to be increased above 25 kHz ?**
- **Alternatively, would they require an entirely new licence product to be developed?**
- **Do you think that we should allocate (at least) some of this spectrum for licence exempt use?**
- **If (at least a part of) this spectrum is made available for use under the existing Business Radio licence products, do you think that more spectrum should be allocated for light licence products as against technically assigned or area defined products?**

:

Amateurs: as per their current licence(s).

Marine: as per their current licence(s).

PMR: as per their current licence(s).

I would suggest 12.5 kHz FM channel spacing to maintain compatibility with existing equipment.

This would allow all combinations of device (handheld, mobile etc) to be used, making maximum use at minimum additional cost of existing assets and spectrum.

Question 3:What factors should Ofcom take into account in deciding how to make this spectrum available (both in terms of the choice of release mechanism and in terms of the timing and speed of release)?:

Availability of equipment (and consider how easy it might be to adapt existing onto the newly-released sub-band(s)).

Ease of amendment to any existing licences.

Ease of new licences for those bands.

Release mechanism - decide on a release date, notify existing licencees of spectral extensions, agree with some licencees on a change of their operating frequency / CTCSS and implement on the agreed date.

For PMR this could be staggered by geographic boundary to help alleviate the potentially high change demand.

Question 4:What total bandwidth in megahertz (MHz) would you require to operate the prospective service (whether the authorisation is provided under licence or is licence exempt)? (eg. if answering 25KHz, please make clear if this is 1 x 25 kHz or 2 x 12.5 kHz):

In accordance with existing licences - we have a good system at present - no good reason to change as it seems to suit most users well.

Question 5:Would this bandwidth need to be contiguous?

If so, please explain why your service requires contiguous blocks only.

If not, what would be the size of individual channels within the overall bandwidth?:

Probably yes, for the Amateurs (146-148).

Probably yes for the Marine (154-156).

Probably no for the PMR.

Rationale : The newly available spectrum butts up very nicely to their existing allocations.

Question 6:If you think the prospective use would be suitable for licence exemption, please indicate the transmit power levels you are likely to require:

Definitely not suitable for licence free operation.

Question 7:In which geographic area are you likely to use the spectrum (eg. UK Wide, Regional, Conurbations, Rural):

UK wide, following rationale above.

Question 8: Please give a brief description of the technology (ies) that you will be using with the spectrum that you license:

All modes, depending on user type.

Amateurs will use voice, CW, data (in many different forms) as per their existing licences.

Marine will most likely use voice and perhaps some data channels (i.e. Navtex etc)

PMR mostly voice, some data.

Question 9: Would you require a minimum licence tenure for you to consider operating your service? If so, how long (in years) would you want this minimum licence tenure to period to be (noting that you might need to pay for the full minimum tenure period on licence issuance)?:

Yes.

I would consider periods of 5 years for Amateurs.

I would consider periods of 2 years for Mariners.

I would consider periods of 2 years for PMR operators.

Question 10: As explained in section 2, the existing [Business Radio licence](#) products are currently made available in bandwidths of 6.25, 12.5 or 25kHz, although it would be possible to make them available in larger bandwidths where there is enough spectrum to enable this (as is the case with this newly available Mid Band VHF spectrum). In light of this, would your prospective use of this newly available Mid Band VHF spectrum:

Be possible using one of the existing Business Radio licence products in the currently available bandwidths (of 6.25, 12.5 or 25kHz)? Be possible using one of the existing Business Radio licence products, but in a bandwidth greater than 25 kHz (but with other licence conditions remaining as now)?

Require a new type of licence

Require licence exemption

Don't know:

Yes : 12.5 kHz as the "norm" with Amateurs allowed to determine their own bandwidth demands.

Question 11: If your prospective use of this newly available Mid Band VHF spectrum would be possible using one of the existing Business Radio licence

products, which existing licence product would it require?

Simple Site

Simple UK

Suppliers Light

Technically Assigned

Area Defined

If your proposed use is Technically Assigned please indicate if the use will be shared or exclusive:

For PMR users, Technically Assigned to co-ordinate the congestion relief process, UK-wide.

Question 12: Which existing [Business Radio licence](#) type do you currently hold? (Please type in product name) Simple Site, Simple UK, Suppliers Light, Technically Assigned, Area Defined, Combination of the above, None, Don't know :

Associated with combinations of the above

Question 13: Would additional spectrum allow you to consolidate existing assignments? (If so, please provide information on the assignments that you may hand back to Ofcom as a result of consolidation):

The additional spectrum would allow re-assignment to avoid congestion, especially for PMR users.

Question 14: Do you have any further comments:

RAYNET would be very grateful for additional spectrum to help cope with those really busy days when it's hard to find a clear channel.

Marine and PMR users would always be very grateful for additional channels.