

Title:

Mr

Forename:

Anthony

Surname:

Pugh

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:

Having developed an interest in electronics/radio, in my pre-teens I obtained my amateur radio licence in 1966.

This led me to a career in communications with both government and private organisations.

I am a member of the Institute of Engineering and Technology, the Radio Society of Great Britain, a committee member of the UK Microwave Group, and active radio amateur.

My specific interest is in the higher frequencies, including those within 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?:

It's difficult to see how a direct comparison can be made between commercial use and the less direct, and less obvious, benefits that amateur radio has generated.

These bands, by their very nature, and lack of commercial equipment, demonstrate the ethos of self-training as part of amateur radio.

Concern is frequently expressed, by the government, about falling numbers of those skilled in RF development.

Removing, or reducing access to these frequencies would seem to be counter-productive.

Over the years radio amateurs have contributed much to the country, the most recent being during the Olympics.

Good spectrum management is always a consideration but two things immediately come to mind.

Do these frequencies really display the required properties for the purpose under discussion? Surely lower frequencies, with better coverage and penetration, would be a more obvious choice?

What has happened to the other frequencies that were previously freed up?

1.4GHz for instance.

Are they now fully occupied, as good spectrum management would seem to decree?

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?:

I'm not aware of anything.

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

What immediately comes to mind is the possible financial implications of redundant equipment which has been purchased by an individual.

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?:

This has an impact Europe wide, as far as the amateur community is concerned.

Both from the point of view of contacts and the UK beacons they use for propagation studies.

At a stroke it would remove all opportunities for self-training in an area which is important to the engineering future of the country.

In addition there would be considerable personal financial loss related to equipment that could not be put to any other use.

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?:

I'm not aware of any but it should be noted that, as well as the coordinated Region 1 IARU frequencies, there is the requirement for receiving on other frequencies, in the 13cm band, in order to have contacts, via EME, with some non European countries.

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?:

The users of these bands tend to be Full licence holders, with many years of experience. A large number are, or have been, involved in communications professionally. By their very nature they strive to achieve the best specification for their equipment.

As a group we have access to a considerable variety of sophisticated test equipment which is made available as required.

Combining this with the sort of considered band planning the RSGB has always produced, should ensure there are no problems.

One would assume that the LTE equipment would be designed with same levels of excellence as is expected of the amateur, and not to a price.

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?:

The current Ofcom powers are sufficient to deal with any possible problems.

Have there ever been any problems relating to these bands?

I'm certain I've not heard of any.

Should anything unfortunate arise it's the individual problem that should be focused on and discovering where the fault lies.

Not the assumption it's the amateur rather than a fault elsewhere.

The closedown clause is a sledgehammer to crack a nut, a very small nut at that.

It also concerns me that such a clause could be hijacked and amateurs made to carry the can for things not of their making.

This could, possibly, allow vested interests to obtain band clearance by the back door.

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

Although not idea, from the amateurs point of view, this option is the best of those put forward.

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?:

I can't see that any changes are necessary.

The licence already contains the required wording concerning interference.

The users of these bands already, by and large, have access to equipment of a high standard.