

Title:

Mr

Forename:

Petrie

Surname:

Owen

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 have held a Full Amateur Radio Licence since 1985, I currently work as a Chartered Design Engineer for a large UK based Private Sector Communications and Broadcast Company. I am also a Member of the Institute of Engineering and Technology (MIET) My main interest within Amateur Radio is Fast Scan Television using DVB-S and DVB-T Modulation on the 437MHz, 1.3GHz, 2.3GHz and 10GHz Amateur Bands.

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?:

With the explosion of Mobile communications in the past few years, I fully agree in the principles of spectrum release, also with a predicted possibility that Spectrum could be in

short supply within the next few years I accept that some secondary amateur allocations will be under threat.

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?:

Not aware of any other users, although, where I am located in the UK, the 2.3GHz & 3.4GHz band appears not to have any activity, apart from Amateur use.

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

No

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?:

Losing all access to the 2.3GHz & 3.4GHz Amateur Bands would result in a significant loss to the Amateur Radio Community, equipment and test equipment for the band is relatively easy to obtain, Components for home building have become plentiful in the past few years, thanks to advances in Cellular and Wifi technology and, this in turn, has allowed many amateurs to self train in new construction techniques etc.

There would also be a significant financial cost as many Radio amateurs (including myself) would no longer be able to use equipment for these bands and, as it cannot be readily converted for use on the remaining Amateur bands, it would become redundant, this would also have a negative impact on the UK Based Component and equipment sector.

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?:

EME is an activity which currently uses 2319 - 2322MHz, and it would be a great loss to the UK Amateur Community if these these frequencies were to disappear.

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?:

To solve interference issues, a method of Band Pass filtering on amateur TV equipment could be implemented.

An example of this, is Interface Requirement 2022 (IR2022) of which one part is implemented on UHF Band IV / V Digital TV Transmitters with an ERP \geq 100W.

If a similar Spectrum Mask could be defined and agreed by all parties and then implemented; this could mitigate any interference issues.

Additional filtering and /or other mitigation techniques would be well within the remit of a amateur eg we can make and test filters to ensure the station is compliant, and I believe that there is significant support within the Amateur Radio Community to ensure that this is carried out.

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?:

Yes, I Hold two NOV (Notice of Variation) on my existing Amateur Licence for radio links at VHF and UHF, Recently the ERP of these licenses have been altered, the RSGB / OFCOM has a mechanism for altering license parameters individually, so this could be used to mitigate interference issues on these bands, if required.

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

Not entirely, the current proposal would amount to a "collective punishment" for the amateur radio community should any interference occur.

The mechanism for implementation of this policy is ambiguous and could be used by Various organisations to remove the amateur community from the band.

Continued access to these two bands would be appreciated by the amateur community for self learning and educational purposes.

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?:

No new changes required as the Amateur Radio Licence already covers this issue.