

Title:

Mr

Forename:

Mike

Surname:

Stevens

Representing:

Self

Organisation (if applicable):

Email:

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:

As a final point, one should not forget that virtually all the major Radio Communication developments have been instigated by Amateurs, either in their own homes acting as Amateurs or in conjunction with their working environment. There is no reason to believe that this will not be the case in the future. The proposals herein would not be expected to change this but with increasing commercial pressures, more changes may be considered in the future which could well change this viewpoint. This would be to the detriment of the whole Radio Communication community as well as Amateurs themselves.

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 just a parochial view yes, but if we also take into account the current CEPT agreements, will this be the case in the long run?

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 that I am aware of.

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

Not that I am aware of.

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 parts of the 2.3GHz band (in particular) that are in general use for narrow-band modes are not necessarily the same as are used in other countries. It would make much more sense if the occupancy could be better harmonised throughout the world.

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?:

Not that I am aware of.

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 proposal states 4 - 14 instances of interference from amateur uses to others. What evidence is there that any of these are from the bands in question? Theory should be based on hypothesis and fact not just hypothesis alone, so evidence-based decisions should be used rather than 'knee-jerk' ones.

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?:

See my answer to Q6 above. I would not call 4-14 cases of interference across ALL amateur bands 'onerous' to deal with.

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

It would appear that the proposed changes would not directly affect the narrow-band modes uses currently in place, (unless I have misunderstood the text). This would on the face of it be acceptable, but I do have concerns that with commercial pressures this may not be the end of the matter. Time will tell.

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?:

See my answer to Q6 above. Considering the commercial uses of the RF spectrum as well as the amateur uses, the stated number of interference reports is remarkably low. One should not forget the cases of interference TO amateur uses either. These are not insignificant.