

Representing:

Self

Organisation (if applicable):

What additional details do you want to keep confidential?:

Keep name confidential

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:

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?:

Only if it is well managed. I don't currently see that Ofcom has a good strategy for spectrum management.

Also the question is oddly phrased because the comparison should be between outgoing and incoming primary users, not about amateurs who are and could continue to be secondary users.

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?:

Almost certainly. The RSGB tends to document "tried and tested" operating methods in the band plans only. They do not capture operations of experimental nature.

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

Following on from Answer 2, the loss of these bands would inhibit the experimental aspects of the middle microwave bands from amateur use, which is the primary purpose of the amateur licence and arguably more important than the every day communications that is usually represented by the user groups such as RSGB, BATC and UKuG (although it is undeniable that the latter generate a considerable amount of enjoyment).

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?:

No comment

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?:

No comment

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?:

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?:

No, a better solution would to be build in a non interference cooperation into the intended uses of the spectrum

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

No.

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?:

Yes, rather than licensing spectrum on a frequency basis, licencing on a code division basis to allow cooperation of multiple services (amateur and non amateur) would be a more progressive tack.