

Title:

Mr

Forename:

Neil

Surname:

Jonathan

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 am a radio amateur with many years experience in building equipment for and operating on these 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?:

That depends what use is made of the bands after release.

It is difficult to attach a commercial value to amateur use of the bands as this is not what amateur operation is about.

It is more in common with other leisure activities, for example walking, where there is a lot of infrastructure (footpaths, car parks, etc) provided out of scarce resources (land) for the

benefit of participants, usually at no cost to them.

Nevertheless there is some value in the engineering skills which are developed and deployed as part of the amateur use of these bands and then reused in professional areas.

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 don't think so

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

My interest is in narrowband, weak-signal propagation. This activity is focussed in the adjacent bands rather than the release bands, so provided the licence terms in these adjacent bands allowed similar power levels and modes to the current terms I would not be greatly inconvenienced.

I understand it would be more of a problem for amateur television operators.

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?:

These bands have interesting long-distance propagation and are some of the best frequencies for worldwide communication via moon reflection, so both of these activities would be severely impacted.

There is a significant benefit in retaining the 2320-2322 and 3400-3402MHz areas as these are largely harmonised across Europe. I would like to see negotiations to give primary status in these sub-bands for amateur operation.

Finally, I have a significant personal investment in equipment for these frequencies (as do many others) and wish to continue to make use of it.

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 know 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 technical challenge of building equipment for these frequencies means that most operators are highly skilled, with access to good test equipment. UKuG provide further access to equipment and technical expertise.

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?:

Given the low number of reported cases seen so far I think this is unlikely to be an issue. I think varying the licence should be a last resort. There is considerable scope for self-help within the amateur community - OFCOM and RSGB/UKuG/BATC could devise a strategy for addressing interference reports at the frequencies.

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

Given the situation it seems the best way forward for all parties.

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?:

Primary status for amateur operations in the 2320-2322 and 3400-3402MHz bands.