

**Title:**

Mr

**Forename:**

Des

**Surname:**

Kostryca

**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:**

**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?:**

Given the massive increase in demand for spectrum in recent years for things such as home Wi-Fi it would seem logical that release of these parts of the spectrum would have benefits primarily to commercial interests and to a lesser extent UK consumers.

**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?:**

Non 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?:**

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?:**

From my own (and fellow radio amateurs) point of view the most significant consequence of removal would be the loss of the amateur allocation which has in recent years supported extensive experimentation in the lower microwave spectrum. This has enabled many experimenters to gain knowledge and skills in microwave engineering in a very cost effective way. The experimental results obtained by radio amateurs are generally well documented and available for use by others including professional microwave engineers which in turn contributes to the development of new products. For many radio amateurs experimenting in this part of the spectrum the loss of any allocations could also lead to a significant loss in personal investment both in terms of time and money.

**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?:**

Non 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?:**

A fundamental goal of the amateur radio movement in general is to co-exist with other spectrum users and to that end a number of groups exist such as the BATC, RSGB and UK microwave group all of which have a combined wealth of knowledge and expertise relating to the design, construction and practical implementation of filters and other measures to ensure that amateur radio transmissions do not cause a problem to other spectrum users.

These groups actively share and offer this expertise to any and all who request help or guidance in such matters. It is my belief that coordinated efforts between the groups listed above and Ofcom would ensure that any such issues would be dealt with quickly and effectively.

**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?:**

Before any changes are made it would be hoped that some consultation would take place with the above groups in order to fully explore all alternatives before any varying of licences took place.

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

No, the proposed changes in the present form would cause significant harm to established amateur operations in both 2.3 and 3.4 GHz bands. These include established amateur television repeaters which represent a large investment in time and resources on the part of the group(s) who maintain those repeaters.

However, if the proposal could be modified in order to permit the continued co-existence of ATV operations within the proposed bands then it would be much more acceptable and mutually beneficial to 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?:**

It is my understanding that a successful system already exists whereby Ofcom can amend an individual amateur licence in the event of interference so no further changes would seem to be required.