

Chamber of Shipping

Additional comments:

I am responding on behalf of the Chamber of Shipping to the consultation on Ofcom's proposals to extend spectrum transfer to the maritime and satellite earth station sectors. The Chamber is a trade association for UK based ship owners and managers. With nearly 140 members and associate members, the Chamber represents 900 ships of about 24 million gross tonnes and is recognised as the voice of the UK shipping industry. This response reflects the consolidated views of our members, who represent a diverse range of operational shipping interests.

While we support measures to promote optimal spectrum allocation and to maximise the value of the finite radio spectrum resource, we are concerned that existing users of maritime spectrum have not been consulted sufficiently prior to these proposals being issued. We feel that the views of the UK Maritime Spectrum Strategy Group (MSSG) should have been sought. The MSSG was formed as a standing committee to "review and advise on specific and detailed maritime spectrum, and spectrum related operational issues, and to set the strategic framework and direction for maritime spectrum matters".

The Chamber cannot offer its support for the current proposals and we wish to see further discussion of this issue within the MSSG. The MSSG is the appropriate forum to analyse the potential impacts of extending spectrum transfer to the maritime and satellite earth station sectors.

Question 1: Do you agree with our proposal to make maritime licences transferable and the proposed limitations on the types of transfer to be allowed?:

We are concerned by the proposal to extend spectrum transfer to the maritime sector without any clear safeguards for channels used for vital maritime safety and communications purposes. Although the bands being considered are not clearly stated in the consultation documents, we assume that the maritime VHF band is under discussion. While trading of area-defined licences may be possible with minimal interference, trading of non area-defined licences has the potential to cause significant levels of harmful interference to channels used by non-UK vessels visiting UK ports or simply passing through UK waters.

We believe that putting forward these proposals without carefully planned international co-ordination will pose unacceptable risks to maritime safety in and around UK waters. The proposal to allow individual licensees to undertake partial transfers of channel width should be treated with extreme caution. We are concerned that the extension of spectrum transfer could lead to bands in questions being allocated to non-maritime users, greatly increasing the potential for interference.

Question 2: Do you agree with our proposal to make earth station licences in the satellite area transferable and the proposed limitations on the types of transfer to be allowed?:

It is difficult to comment extensively on these proposals due to the lack of information provided on the bands and services involved. However, we require assurance that satellite bands used for maritime safety and communications purposes, particularly by Inmarsat and SAR services, will not be made available for licence transfer. These services are governed by international conventions and therefore unilateral changes would be deemed unacceptable.