

General Comments

I have held a full amateur licence for over 40 years in both the UK and South Africa, and previous to that a G8ANY UHF licence and a G6ABY/T video licence.

I am mainly interested in the VHF/UHF and microwave spectrum with particular emphasis on transmitting ATV in its various forms – analogue, SSTV and digital fast scan.

I have been a member of the RSGB and BATC for nearly 50 years and have been active with techniques such as satellite, EME, ATV, packet radio, digital modes and “normal” voice.

I am concerned that any reduction in amateur bands will effect the amount of development, testing and of course FUN that will be had by many existing and new radio amateurs.

I am also grateful for this opportunity to present my comments to OFCOM.

Questions and Answers

The release bands (2350-2390, 3410-3475 MHz)

Q1. 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?

A1: Unfortunately I have to agree with this as there are far less amateurs than other consumers.

Q2. 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?

A2: None other than amateur modes of operation as far as I know. However new modes and techniques are constantly being evaluated and tested by amateurs, often before commercial use is adopted and it is imperative that these are able to be tested.

Q3. Are there further consequences of removing the release bands from amateur licences that have not been considered in our analysis?

A3: Partly answered in question 2

The adjacent bands (2310-2350, 2390-2400, 3400-3410 MHz)

Q4. 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?

A4: A loss of many frequencies currently being used for modes such as ATV will restrict the “development and self education” part of the amateur licence for those wishing to develop new modes/techniques etc.

Q5. Are there current uses in the adjacent bands other than those detailed in the RSGB's band plan and discussed in Section 3?

A5: The band plan is a general guide and is dynamically changed as new modes or techniques become available so the answer to this is no as your question says "current uses". The band plan does change almost yearly to accommodate both UK and international amateur modes and trends.

Q6. 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?

A6: It will be difficult to regulate interference measures and also probably not practical for amateurs to add additional filtering to transmitters. Most amateurs would also not have access to, or knowledge to operate, test equipment to check "close in" spuri. The commercial operators on the other hand have this available to them and they are far fewer in number than the amateur radio operators so it will be easier for them to ensure their equipment can operate with other adjacent signals.

There are a number of workshops each year that have test equipment and qualified personnel that amateurs may use. These are the people who can help and advise amateurs (and commercial interests) on interference matters.

Q7. 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?

A7: No. Each case of interference is (I understand) currently investigated and controlled separately. As far as I am aware, amateurs have a means to ask the RSGB etc. for assistance with interference matters and usually solve these without OFCOM involvement.

It has happened before that if there was widespread interference from amateur stations then the RSGB etc. would draw up guidelines and that the majority of amateurs would abide by these rules, again without OFCOM involvement.

Q8. Do you agree with our preferred option?

A8: In essence yes. It is very important that amateurs have access to all frequencies and modes that are currently allowed. I believe that amateurs provide much information and development that commercial users employ in their future plans and equipment.

Q9. Are there additional changes to the Amateur Radio Licence which would assist amateur in lowering the risk of causing harmful interference to new uses?

A9: Probably not as the amateur licence states that undue interference must not be caused to other users. Amateurs have been self regulated for longer than I have been licenced and have been able to co-exist with many users. Examples of this can be found in the frequencies used on the 23cm band for ATV repeaters and the 70cm band in certain areas all the time and particularly during the Olympics last year.