

**Title:**

Mr

**Forename:**

Ian M.

**Surname:**

Mciver

**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?:**

Reluctantly, given the huge historical and ongoing technical contribution made by Radio Amateurs, I agree.

**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 am unaware of any.

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

Apparently not.

**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?:**

The most significant consequence of the complete removal of access to the 2.3 - 3.4GHz spectrum would be the loss of a part of the UHF/microwave spectrum which provides relatively straightforward access to radio amateurs who wish, for interest or self-education, to explore the characteristics of this area of the spectrum.

It would also lead to personal financial loss, amounting to several hundred £££, which I have invested in equipment for these allocations. It is very probable that much of the equipment used could not be readily adapted for use at other than very similar frequencies.

**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?:**

I am unaware of any.

**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?:**

Amateurs do already have the equipment and expertise to design, make and test suitable filters, however the BATC and UK microwave group are actively considering the extension of the existing informal "elmer" network, which provides help and support to others in the hobby, to identify people who are experts in interference mitigation. This network would be made available to provide practical help and support to any amateurs who feel they may be liable to cause undue interference to other users and could be available to assist with any reported incidents of interference.

We are also planning a series of articles in our in-house publications, CQ-TV and Scatterpoint, covering the practical aspects of filtering and reduction of problems and the construction filters. Equipment and filter testing will also become a major focus of the hands on workshops organised at the roundtables organised regularly by both organisations.

Pending the outcome of the review, it is highly likely that the BATC / ETCC will review and change the ATV repeater specifications and the BATC is committed to providing support to those repeater groups who may be impacted by the changes.

A more open approach by the primary users of the shared bands as to sub bands of frequencies that should be particularly avoided, would aid proper band planning by the RSGB and special interest groups, such as UKuG and BATC, to ensure the amateur services can co-exist with other services both in the released and shared bands.

**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 blanket changes are made to amateur use of the shared bands is made, it is hoped that Ofcom will enter in to discussions with the RSGB, BATC and UK microwave group to try and resolve the situation.

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

The preferred option will cause severe disruption to Amateur Television operation in both 2.3 and 3.4 GHz bands.

Whilst it is accepted that ATV repeater outputs will transition to digital operation, it is absolutely vital that we continue to have access to at least 1 analogue ATV channel at 2.3 GHz for simplex and repeater inputs.

Without this, analogue ATV operation will no longer be possible on any band between 1.2 GHz and 5.6 GHz and this will have a major impact on the hobby and a major financial impact on the individuals who have equipment for ATV operation on 2.3 and 3.4 GHz.

As long as ATV can continue to be accommodated within the 2.3 GHz band, Ofcom's preferred option is, if not entirely desirable from the amateur point of view, acceptable.

**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?:**

There already is a mechanism whereby Ofcom can amend an individual amateur licence schedule should a station continue to interfere with other services and I see no reason why this cannot be used in the future.