

Representing:

Self

Organisation (if applicable):

What additional details do you want to keep confidential?:

Keep name confidential

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 appreciate Ofcom providing the opportunity for radio amateurs to comment.

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?:

It is difficult to judge the relative merits of providing users with more bandwidth to use on what appears to be predominately leisure activity compared to providing a facility for potential future communication engineers to gain experience on real radio systems. However, commercial interests present more tangible benefits so it is difficult to argue against.

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?:

Not 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?:

Not that I am aware of.

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?:

I don't think the analysis properly recognises the benefit of providing a facility that allows people to gain experience of propagation at these frequencies. I know from my own experience in industry that finding staff who have a feel for the way radio works is getting increasingly difficult. The move to digital systems makes this even more difficult as you can no longer hear or see the immediate effects of co-channel, intermodulation or other RF interference.

Those amateurs already operating in these bands may experience financial loss regarding their existing equipment. However, this is insignificant compared to the commercial interests and it is suggested that a suitable compensation fund could be made available. This precedent has already been set with the 4G model providing assistance where the new allocations cause interference to domestic TV reception.

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 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?:

The amateur license already requires the control of out of band emissions and the current enforcement regime seems to be effective. Those operating in these frequency ranges tend to be those of greater technical interest and resources, frequently assisted by other amateurs in the same field. I would be more concerned about close proximity effects due to receiver overloading both to and from LTE.

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?:

I would expect a proper investigation to be made instead of a quick fix and possibly inappropriate solution being instigated. I would also query how operators intend to monitor for, and investigate interference, especially at the terminal end. Apparent interference at the LTE site could be due to local defects, e.g. intermodulation from poor connectors or corroded antenna elements.

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

Digital systems are heavily reliant on test equipment for the determination of signal quality and the impact of propagation, noise and interference. I believe there is value in users gaining experience with analogue systems first to get a better feel of what actually is going on. This requires more spectrum and I feel it is essential to maintain enough space for those to try analogue transmission first.

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?:

In the event of close proximity desense issues, ERP limits could be applied in certain situations, specifying elevation and bearings where appropriate. However, this should not be seen as a quick fix solution, i.e. poor receiver front end design on the operator's site should not be tolerated. Applying such constraints must be justified and needs to also involve the operator in a mutually contributed solution.