

**Title:**

Mr

**Forename:**

J Peter

**Surname:**

Harston

**Representing:**

Self

**Organisation (if applicable):****What additional details do you want to keep confidential?:**

Keep part of the response confidential

**If you want part of your response kept confidential, which parts?:**

email address

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

I have held an Amateur Radio licence since 1971 and am active on HF, VHF, UHF and microwave bands.

I have operated Amateur Television for many years and am a member of the RSGB.

Amateur radio was a key factor in my decision to pursue a career in Engineering.

I have been a professional Broadcast Television Engineer for nearly 40 years and am employed at a senior level by a large independent TV Production Group.

I am a Member of the Institution of Engineering and Technology.

For many years I have noted the valuable interchange of ideas and technology between Amateur radio/Television and Broadcast Microwave Link operation.

**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?:**

The tone of this question would indicate that the benefits to consumers and citizens WILL be greater than from retaining the current amateur use.

It may be however, that insufficient consideration has been given to the potential interference which may be caused by new 2.3GHz services to the many devices operating in the existing 2.4GHz band.

There can be little doubt that much of the RF technology currently in use in the release bands has had its roots in designs originating in amateur radio.

Radio amateurs have for many years held highly technical positions in the RF and Broadcast Engineering sectors and there has undoubtedly been an interchange of ideas and technology between the amateur and professional spheres.

Accordingly, Amateur radio has played a vital role in the growth and development of RF technology in the release bands and this must not be overlooked in reallocation of spectrum.

**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?:**

Most of the current uses appear to have been covered satisfactorily.

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

It has been increasingly difficult to find spectrum to accommodate Amateur Television.

The reduction in available spectrum in the UHF bands has forced operation to higher bands, notably the release bands.

The reduction in bandwidth caused by the removal of the release bands will preclude the majority of analogue TV operation in these bands rendering the equipment obsolete.

Digital equipment could assist in reducing both bandwidth and required power level, with the bonus of reduced potential interference. However, by its very nature, the equipment required can be expected to be both more expensive and technically challenging.

In previous band clearances, users who have been displaced have received financial compensation to allow replacement equipment to be funded.

**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?:**

Removing the adjacent bands would deny any Amateur access across several octaves of spectrum with the complete loss of propagation possibilities that currently exist.

Expensive equipment, in terms of both components and construction effort where commercial options have not been available, will be rendered useless with no possibility of re-use.

**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?:**

This appears to have been explored satisfactorily.

**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 using the release bands would be keen to minimise any potential interference to ensure that they are able to maintain access.

The nature of most operation would require high-gain narrow-beamwidth antennas directed away from other users.

**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 believe that this process could be flawed. Any interference encountered from Amateur stations should fall well within the scope of the existing Ofcom mechanism for dealing with problems without becoming "too onerous."

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

Whilst the preferred option may be regarded as the "least worst" option, Radio Amateurs would obviously wish to maintain as much useable spectrum as possible.

In other band clearances, users have generally been given access to alternative spectrum as close as possible to the cleared frequencies.

**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?:**

The Amateur Radio Licence already places a responsibility upon the holder to prevent any undue interference to other users.

Accordingly, it does not appear necessary to change the licence.