

General Comments

- *I have held an amateur licence since 1972 being active on VHF/UHF and the lower microwave bands up to 2.3Ghz and I am currently in the process of building equipment for 3.4Ghz. I have been a member of the RSGB since first obtaining my licence and am also a member of the UkuGp. I am the Repeater Keeper for the Cambridgeshire Repeater Group.*
- *My main interest is in weak signal working and have an interest in learning more about the various propagation modes on these frequencies. All activity is on narrowband, either SSB or CW, though data is a possible future development.*
- *Whilst the loss of any amateur access to any frequency is undesirable I feel it essential that we retain some common access to all frequencies currently allocated within the IARU. The loss of 2.3Ghz and 3.4Ghz would incur considerable financial loss to myself as well as the inability to continue my self education into propagation modes at these frequencies.*

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: Since the amateur service is not a commercial operation it is unfair to compare benefits based purely on monetary terms. Whilst in these economic times it is difficult to argue for the retention of the release bands as an amateur secondary allocation it mustn't be overlooked that many amateurs are (or will become) RF engineers and the ability to experiment in this part of the spectrum can be of great benefit to companies that will benefit financially from the practical skills learnt from the hobby.

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 that I'm aware of.

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

A3: The loss of analogue TV which will either deny a simple access route or involve significant expense to individuals to upgrade their equipment to DATV.

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: The most significant impact of complete removal of access to this part of the spectrum would be the loss of frequencies that allow fairly straight forward access for amateurs that wish to experiment for self education and improvement. It is part of the spectrum that makes EME a reality for those with average gardens and is useful for propagation research. The total loss of these bands in the UK would also deny our European neighbour access to the UK beacon network to allow them to study propagation also.

In addition there will be significant financial loss to many amateurs with the majority of equipment not being suitable for retuning or re use on other frequencies.

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: As per my answer to Q4 the 3.4Ghz band is a particularly useful frequency for research into different types of propagation having characteristics found both at lower and higher frequencies. The 2.3Ghz band is seeing increased use of scatter reflection from aircraft and other objects as well as EME. This needs co-ordination with other countries so a common allocation within IARU is essential in order to continue.

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: Time to evolve a proper band plan and allow amateur TV stations to move to appropriate frequencies before releasing the release bands should be built into the schedule.

Amateurs active in this part of the spectrum are mostly experienced and the majority belong to the specialist groups such as BATC or UkuGp. These already hold regular meetings (round tables) that provide access to test equipment and have "Elmers" based around the country to assist others in setting up equipment. It is envisaged that this level of support would continue and once the requirements of any changes are known (such as extra filtering) then it would seem likely that with the technical ability of these groups designs would be published in their magazines and probably manufactured as well in order to assist those without the facilities to produce them themselves.

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: Firstly it would be nice to know what level would be considered as onerous!
At the moment very few complaints arise across the whole spectrum so it would seem harsh to assume that there would be a massive increase in cases. It would be nice to think that before any licence is varied attempts are made to resolve any problems first? And time should be given to re-engineer a station if necessary before a permanent restriction is put in place.

If Ofcom does decide any problems become onerous then I would hope that Ofcom would enter further discussions with RSGB, BATC and UkuGp in order to find a solution before total loss of the bands. E.g. it might be necessary to close down or limit ERP for those using ATV, Data Links or EME use while allowing other usage to continue. Whilst not a palatable solution at least it would be better than a total loss of access.

In the case of sharing with a PMSE licence again it would be better to accept a temporary geographic restriction as per The Olympics rather than risk a raft of onerous complaints.

Q8. Do you agree with our preferred option?

A8: In the current economic times it is acceptable, though not desirable. It is essential for amateurs to continue to have some access to this part of the spectrum to enable experimentation and self education which will benefit commerce by the knowledge passed into the workplace.

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: As per answer to Q7 maybe the possibility of having to remove certain modes or impose power restrictions if incompatibility is proven but not at this stage of the discussion. The current licence already has clauses requiring amateurs not to cause undue interference and it is difficult to see how this can be altered to improve it.