

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:

Firstly, I would like to congratulate Ofcom on entering into this consultation with secondary users, we are aware that other countries spectrum management authorities have not been so accommodating. As a result I believe you have created a deal of goodwill within the amateur radio community which bosed well for a workable and usable solution

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?:

Any active and well managed use of the radio spectrum is to be welcomed. Certainly in terms of numbers of users the release bands will be much better populated than they are at present. In terms of radio engineering usefulness and experimentation it is not possible to determine how things will pan out.

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?:

None known

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

In band amateur in-band repeater operation will not be possible, unless in the short term all repeaters can migrate from analogue to digital input

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 obvious consequence of the proposed changes to these allocations would be the loss of the major part of the low microwave spectrum. This currently enables radio amateurs who want to experiment (in line with the ethos of their licence conditions) Access to both 2.3 and 3.4Ghz whilst still requiring expensive test gear and equipment is still within the realm of possibility for many experimenters.

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?:

None known

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 several hundred active amateur experimenters who currently use the release bands are typically professional RF engineers and designers, some are OFCOM staff. The lack of commercially available equipment means that a very significant financial outlay in test equipment and components is involved. This is a small 'community' of like minded experimenters and expertise and information is readily shared. My own radio club has access to Spectrum Analysers up to 22 Ghz in frequency (greater indeed than that which you equip your mobile staff). The RSGB Microwave Group has members throughout the UK who can test members equipment. Given that the LTE users will be using devices whilst on the move and moving between base stations I suspect that any suspected cases of interference would be transient at worst. Coupled with typically low amateur occupancy of the bands in question and the use of narrowband antennas and low power levels this is not a problem that I believe will occur. Ofcoms experience with amateur operators during the 2012 Olympics should give you no cause for concern.

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 am not in a position to determine what could be considered 'too onerous'.

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

I'm looking ways in which the amateur community can assist in reaching a mutually acceptable compromise, whereby financially valuable radio spectrum is released to high paying bidders to enable rollout of 4th generation mobile broadband BUT still allowing radio experimenters access. albeit on a much reduced basis

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?:

Implementation of lower power limits within geographical areas where interference from amateur users was proven (eg urban areas) as has been the case with 430Mhz