

Title:

Mr

Forename:

Richard

Surname:

Burrows

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?:

I can see that the pressure on spectrum above 400 MHz, and the impact on the economy if this is not made available for new services, it is difficult to argue for the retention of the release bands as secondary amateur allocations. But I wonder if amateur license fees were reintroduced at a higher tariff say £50/annum, amateur bands so threatened could be more self supporting.

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?:

Only that it will somewhat restrict the type of experimentation by amateurs in future years.

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 lends itself to experimentation, and aid self-education, to explore the characteristics of this area of the spectrum.

Individuals who have equipment for these bands will have financial consequences, since equipment will be redundant.

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?:

Probably not.

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?:

Radio amateurs pride themselves on achieving and complying to the rules that apply to them, this includes self-education and application of equipment characteristics to ensure close compliance. Amateurs have access to suitable test equipment to ensure these parameters are met and maintained. This stems from the historical ethos of the radio amateur doctrines.

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 into 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?:

Why is it assumed the radio amateur will be the one to blame. Inadequate design of the new user equipment is just as likely where costs are reduced during manufacture, to provide the minimum performance but with wide open front ends.