

Title:

Mr

Forename:

Noel

Surname:

Matthews

Representing:

Self

Organisation (if applicable):**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 thank Ofcom for both the very detailed and well researched report and the open discussions you have had with RSGB and BATC.

Secondly, whilst I realise commercial pressures are enormous, I would urge you to recognise the value of amateur radio in inspiring, educating and giving practical hands on experience to young engineers, particularly at the higher frequencies, where there is little or no off the shelf equipment.

Finally, I would urge you to try to accommodate 1 analogue TV channel on 2.3GHz. BATC is making significant progress in encouraging stations to go digital, but do not believe we are yet in a position to ask every operator to throw away his investment in analogue and make a significant investment in DATV equipment. This could be achieved by looking again at re-allocating 2300-2310 MHz to the amateur service or providing a temporary allocation in the release bands for a migration period.

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?:

Given the pressure on spectrum above 400 MHz, and the impact of 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.

However, the release of the 2.3/3.4 bands will not make any significant contribution to consumer/citizen priorities which focus on reliable connectivity, not-spots, rural coverage etc - which is better solved by lower frequency alternatives such as 700/800/900MHz (and hopefully 1.4GHz) that have far better reach and building penetration.

It should also be of considerable concern that the number of experienced senior rf engineers in the UK is rapidly declining (and many are licensed amateurs). At these frequencies the self-training aspect of amateur radio is considerable as there is little off-the-shelf equipment. Amateur Radio plays key development, educational and practical training role at these frequencies that other institutions struggle to. In the past, amateurs have given considerable service to the nation, inspired leading companies such as SSTL etc, underpinned the work force of a raft of UK rf companies and volunteered for the 2012 Olympics.

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?:

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.

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 provides relatively straightforward access to radio amateurs who wish, for interest, or self-education, to explore the characteristics of this area of the spectrum.

It would also lead to significant personal financial loss, possibly individually in the region of £2k, to the several hundred individuals who have invested in equipment for these allocations. It is very probable that much of the equipment used could not be readily adapted for use at other than very similar frequencies.

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, although I would draw your attention to the fact that the loss of 2300 - 2310 means that UK narrow band section is no longer aligned with that in other parts of the world.

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 do already have the equipment and expertise to design, make and test suitable filters, however the BATC and UK microwave group are actively considering the extension of the existing informal "elmer" network, which provides help and support to others in the hobby, to identify people who are experts in interference mitigation. This network would be made available to provide practical help and support to any amateurs who feel they may be liable to cause undue interference to other users and could be available to assist with any reported incidents of interference.

As chair of BATC I can add that we are also planning a series of articles in our in-house publications, CQ-TV covering the practical aspects of filtering and reduction of problems and the construction filters. Equipment and filter testing will also become a major focus of the hands on workshops at the roundtables organised regularly by BATC.

Pending the outcome of the consultation, it is highly likely that the BATC / ETCC will review and change the ATV repeater specifications and the BATC is committed to providing support to those repeater groups who may be impacted by the changes.

A more open approach by the primary users of the shared bands as to sub bands of frequencies that should be particularly avoided, would aid proper band planning by the RSGB and special interest groups, such as UKuG and BATC, to ensure the amateur services can co-exist with other services both in the released and shared bands.

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 in to discussions with the RSGB, BATC and UK microwave group to try and resolve the situation.

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

As long as enough spectrum for 1 analogue ATV channel nationwide can be accommodated within the 2.3 GHz band, Ofcom's preferred option is acceptable.

One way to accommodate this would be to review the use of 2300 - 2310MHz, which is allocated by the ITU and CEPT to the amateur service. If some or all of this spectrum become available to amateurs in the UK, it would not only allow us to re-align our narrowband and EME activities with other countries but would provide enough spectrum for 1 analogue ATV channel nationally.

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?:

There already is a mechanism whereby Ofcom can amend an individual amateur licence schedule should a station continue to interfere with other services and I see no reason why this cannot be used in the future.

However, I believe the amateur community will take a responsible attitude towards this, just as we did with temporary spectrum allocations during the Olympics, and organisations such as BATC and UK microwave group will work together with RSGB to adopt best practices and provide help and support to our members to work within them.