

Title:

Mr

Forename:

Martin

Surname:

Richmond-hardy

Representing:

Self

Organisation (if applicable):

UK Microwave Group

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:

The importance of amateur radio as a training and investment in UK plc should not be underestimated. The microwave part of the spectrum plays an increasing part in commercial systems and the UK needs people who understand the subject from a practical and commercial point of view.

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 release bands are currently allocated on a secondary basis and therefore already restricted in operation w.r.t the primary user (MOD).

I am fully in favour of the principles of good spectrum management. In the current climate, it is difficult to argue for the retention of the release bands as secondary amateur allocations.

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 known.

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

No

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?:

Amateur radio has a long history as a route to technical, engineering, design, manufacturing and other careers beneficial to this country's economy. Removal of the adjacent bands (which provides relatively straightforward access to radio amateurs) will be a discouragement to future radio amateurs. It will also represent a financial loss to those amateurs who have invested in equipment which is unlikely to be adaptable to other bands.

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?:

Research into and exploration of marginal propagation mechanisms.

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 are trained to be very responsible and generally behave as such. Interference may arise from either poor transmitting equipment or poor design/installation of affected equipment.

Setting up an interference advice service via the RSGB or the UK microwave group would be a sensible and pragmatic approach.

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?:

No. There is a considerable investment in time, expertise, equipment and money to establish an Amateur Radio station. If and when there is an onerous level of interference from Radio Amateur operation in the adjacent bands, then the RSGB and UK microwave group can be relied upon to take a responsible approach. If an individual operator is not behaving responsibly, then that individual's licence may be withdrawn.

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

Yes. Withdrawal of the spectrum would, however, affect international use of the adjacent bands by UK Radio Amateurs. That part of the proposal seems heavy-handed and unnecessary, given that there is no experience, yet, of the operation of "Future Wireless Broadband" in the release bands.

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?:

A Radio Amateur is already required to suspend operations if causing interference under licence condition 5(1)(b). Real operational experience of the operation of "Future Wireless Broadband" may enable a more practical answer to the question.