

## Ofcom Consultation

### 2.3 and 3.4 GHz spectrum award:

Consultation on the 3.4GHz band plan and other aspects of the award

## Joint response from the Radio Society of Great Britain, UK Microwave Group, Amsat-UK and BATC.

November 2013



### Introduction

This response is a joint one to the above Ofcom consultation from the Radio Society of Great Britain (RSGB, [www.rsgb.org.uk](http://www.rsgb.org.uk)) and its national affiliates who have microwave spectrum interests - Amsat-UK ([www.uk.amsat.org](http://www.uk.amsat.org)), UK Microwave Group (UKuG, [www.microwavers.org](http://www.microwavers.org)), and the British Amateur Television Club (BATC, [www.batc.org.uk](http://www.batc.org.uk)).

RSGB is recognised as one of the leading organisations in the world in the field of amateur radio. It collaborates with its fellow national societies via the International Amateur Radio Union (IARU) through IARU Region-1 ([www.iaru-r1.org](http://www.iaru-r1.org)).

Amateur radio is a science based technical hobby enjoyed by over three million people worldwide. From a statutory point of view it is fully recognised by the International Telecommunication Union (ITU) as a Service and is listed in the ITU Radio Regulations as the Amateur Service and the Amateur-Satellite Service.

Amateur radio has international secondary allocations in the 2300 and 3400 MHz bands, which are adversely affected by Public Sector Spectrum Release (PSSR). Whilst the detailed impact on amateur radio usage has been covered in an earlier Ofcom consultation, a continuing concern is to achieve a harmonised solution that gives both existing and new users a degree of certainty and consistency. This is particularly true for frequency segments that are key for long distance weak-signal amateur and amateur-satellite activity, such as 3400-3410MHz.

In this respect the proposed 3.4GHz Time Division Duplex(TDD) band plan (currently on CEPT consultation) is of serious concern as we discuss overleaf, and would welcome Ofcom taking a more pro-active stance to refine it.

As with previous inputs related to the PSSR process, we are grateful for the ongoing engagement with Ofcom and would be glad to provide any further detail to Ofcom should it be required

## Questions & Answers

*Question 1: Do you agree with our proposal to award the 3.4 GHz band in a way that is consistent with an unpaired (TDD-compatible) band plan only, and to make this decision sooner rather than later? If not, please set out your reasons and any evidence for your view.*

In our previous input to Ofcom we briefly highlighted a concern with the TDD band plan and now amplify that with a request that Ofcom first address concerns and inconsistencies in the 3400-3410 MHz area.

We note that more detail has become available from CEPT and that this shows that the 3400-3410MHz section (whilst retained in the UK) is potentially made available in other countries if the TDD band plan is used, whereas the FDD band plan fully caters for incumbent Primary and Secondary services by excluding that section.

The European Common Allocation table allocates 3400-3410MHz to the Amateur Service on a secondary basis under footnote EU17 and other ITU Regions have both Amateur and Amateur Satellite ITU allocations in this section as well.

The EU17 is implemented in an increasing number of CEPT countries and states:-

*"In the sub-bands **3400-3410MHz**, 5660-5670MHz, 10.36-10.37GHz, 10.45-10.46GHz the amateur service operates on a secondary basis. In making assignments to other services, CEPT administrations are requested wherever possible to maintain these sub-bands in such a way as to facilitate the reception of amateur emissions with minimal power flux densities."*

In effect, EU17 allocates and encourages administrations to afford some consideration to amateur weak-signal operations in the sub-band 3400 – 3410 MHz, amongst others. However we note that amateur secondary use and EU17 is not obviously mentioned in the 'considerings' of the draft CEPT decision, which unfortunately reduces the information and guidance.

We are keen that amateurs are able to continue to undertake long-distance international narrowband communications and propagation research at the very bottom 3400-3401 MHz band edge, a frequency slot that has been globally harmonised (whilst recognising it is on a secondary basis).

We would therefore welcome Ofcom taking an active stance to refine the TDD band plan so it is more consistent for UK and CEPT-wide use. This would then align it with previous Fixed Wireless and current Frequency Duplexed (FDD) band plans, as well as being more compatible with incumbent Primary Users – who we have successfully shared with for a considerable time.

*Questions 2-14:* No Comment

*Question 15: Do you have any views on the non-technical licence conditions discussed in this document, including coverage and roll-out and "use it or lose it"?*

Regarding a potential condition for "providing information":-

We would favour a publicly accessible facility so that the location of commercial wireless base stations for 2.3 and 3.4GHz can be readily checked, in order to help coordinate our own usage in retained/adjacent spectrum.

*Question 16-18:* No comment