

Title:

Mr

Forename:

David

Surname:

Powis

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:

I have been licenced as an amateur since 1968, and have operated on all bands from LF through to 10GHz, using many different modes. I have been trainer for UK amateur licences since 1973, and am currently a member of the Radio Communications Foundation Standards Committee, in addition to running courses at all levels.

Professionally I am currently a Further Education lecturer in Engineering - I offer all my students amateur licence training as an adjunct to their academic studies .

I am the trophies manager for the UK Microwave Group, and a committee member of Leiston Amateur Radio Club.

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 commercial imperatives that drive spectrum these days, and the growth in embedded radio devices in products, the requirement for access to these frequencies is probably inevitable. At the end of the day, the benefit to UK consumers and citizens depends on the actual services and applications that are placed in these bands, however, it is likely that the benefit will be greater

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?:

Since these are areas where considerable experimentation and development takes place, it is quite likely that there are specific users, or small groups of users who are working with applications that would not yet be included in band plans.

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

See above comment to Q2

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?:

Removing access to the adjacent bands potentially could have a very serious effect on the 'self-training' nature of the amateur licence in respect to microwave development and experimentation. Any such applications that may fall under my response to Q2, do at least have the potential to move into the adjacent bands area, so long as they continue to support amateur use. If these are lost too, then any work at these frequencies by amateurs could be lost. It is well documented that amateurs have been innovative at all frequencies across the spectrum, and have provided input to professional radio engineering. It is also important to remember that many professional radio and microwave engineers have come from a personal interest developed through amateur radio.

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?:

See response to Q2

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?:

Given the nature of the vast majority of amateur operating, such interference is probably of low risk in the release bands. Amateur communications are generally quite short and transient in nature. Taking into account the highly directional nature of the antennas used for most of these contacts, the potential for interference to any specific system is also quite limited. It has not been widespread practice to incorporate high specification filtering on the output of microwave amateur transmitters - the changes that are the subject of this consultation modifies the context in which amateurs work, and it will become appropriate to include such

filtering as a matter of course, not only in the adjacent bands, but also any lower frequency bands which have a harmonic relationship to the release 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?:

Considering the comments made in reagr to Q6 above, and historical fact that incidence of interference to services from amateur transmitters have generally decreased with the move to digital transmissions, I feel that all the powers needed by Ofcom are already in place, and are unlikely to need to be amplified.

As noted above, any cases of interference are likely to be very short lived, however, where the situation is unsustainable, the UK Microwave group has both the technical expertise and the will to support Ofcom in solving cases.

Given the nature of any likely interference, I feel it is unlikely that blanket variations to licences would be needed, even in the extreme, although it could be possible to consider situations where amateurs within a small geographic area might have a common variation placed on them if no other solution can be found. I strongly feel this should be a last resort, and only applied when all other avenues have failed.

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

Before variations to licences are applied in general, consultation should have been made with the RSGB, and through them the main amateur user groups of the UK Microwave Group and BATC. Any support available from UKuG and BATC in terms of technical expertise to assist in investigating issues should also be exhausted.

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?:

Current clauses in the amateur licences at all levels should provide adequate scope for Ofcom to control any issues, given the other co-operative resources that are being put on the table by RSGB, UKuG and BATC to protect amateur usage in these important areas.