

Title:

Mrs

Forename:

John

Surname:

Sager

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?:

It is difficult to argue with this,

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 to my knowledge

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

None that I can see.

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?:

This would remove from use an important sector of the spectrum and deny amateurs the capability to experiment and 'self-train' in the techniques used in communication equipment at these frequencies. As such it eliminates a skill pool available to UK industry in a frequency range deemed important enough to make it available for other uses.

Many professional radio engineers were amateurs before they became so and continue to be amateur operators alongside their professional work.

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?:

There are always new techniques developed to utilise spectrum in new ways. Amateurs do this as much as radio professionals, and it is unlikely that the RSGB have second-guessed all the possibilities.

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 have always been conscious of their obligation to minimise interference and there are various self-policing activities either sponsored by the RSGB or by specific interest groups within the hobby. Given the sensitivity with which use of the adjacent bands is obviously viewed by OFCOM, then I see no reason why additional measures will not be developed to counter this. Many amateurs have access to professional test equipment and already run 'clinics' at meetings in order that equipment used by other amateurs can be tested. This will carry on and will probably increase in scope.

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?:

I fear that this proposal is very unsatisfactory. It is driven not by technical considerations but by administrative convenience. It would also be far too easy for an entity intent on preventing amateur access to 'game' the process. OFCOM will be duty bound to devote effort to investigating complaints, however frivolous they turn out to be. Whatever level of expected effort you set (which will inevitably change with internal OFCOM priorities, budgets, etc), there will always be the possibility that the level of complaints will exceed this, and therefore trigger the three-month shutdown process. I see no right of appeal enshrined in the proposal, which surely should be there to ensure that neither side to a dispute is unfairly treated.

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

It is the least worst option.

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?:

This is surely adequately covered by the current licence condition not to cause undue interference to other services.