

Title:

Mr

Forename:

C.j.

Surname:

Langley

Representing:

Self

Organisation (if applicable):

What additional details do you want to keep confidential?:

Keep part of the response confidential

If you want part of your response kept confidential, which parts?:

Email address

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?:

There will be a benefit if the UK consumers and citizens actually purchase the products that need all this spectrum space.

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?:

I am not aware of any.

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

Amateur radio data and ATV usage has moved into the 2.3GHz and 3.4GHz Amateur bands due to pressure on spectrum space in the lower UHF and microwave bands. This has involved much time and cost to develop the equipment for these bands. Amateur radio is not a commercial activity. It was done with the background of a stable environment sharing the band with the MoD (Ministry of Defence) for many years without any issues. This work will now be lost. It seems strange to me that Amateurs have been able to share this spectrum with the MoD for over 50 years without problems, but once a fee payer comes into sight Amateurs must be moved out.

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?:

These bands are used for Amateur Radio technical experiments and allocated as such on an international basis. Removing all amateur operation on these bands will stifle amateur radio experimentation and development pursuit in the UK, and prevent the UK amateurs from contributing to international work in this part of the spectrum. Because of the time and personal cost, Radio Amateurs need a stable spectrum background to experiment and develop their equipment; we are not a commercial outfit. Amateurs cannot afford to develop equipment when their radio spectrum is under permanent threat of removal.

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?:

I am not aware of any.

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?:

In the USA there are already 31 million 4G subscribers, in the UK there are currently 41,000 (source: ElectronicsWeekly.com news section June 2013). The FCC (Federal Communication Commission) has not seen fit to remove amateur radio operators from either of these 2.3GHz and 3.4GHz international amateur bands in the USA. I would like to suggest that Ofcom should seek information from the FCC (it's counterpart in the USA) as to the interference cases that have arisen from Amateur Radio usage in that country where the 4G usage is considerably more advanced than in the UK. The FCC has also allocated for many years an amateur band at 902-928MHz, right in the middle of the original cellular bands; perhaps data from FCC investigated interference cases on this cellular band in the USA may also indicate any possible problems with handsets and base operation when very close to an amateur band.

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, I believe that Ofcom should investigate each case to determine if the cause is really due to amateurs and not other users of this part of the spectrum. And then decide at the time how to deal with that particular case. The usage of these bands by Amateurs in the UK is mainly by those with a technical development interest.

I think because of this fact the actual perceived threat to commercial operations may well turn out to be quite low when actual equipment is available. Levels of immunity standards of commercial equipment should be considered as well. These bands are often subject to various propagation modes, e.g. ducting, which at times may cause signals from other areas to be quite strong and give issues that were maybe not foreseen at development time.

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

Yes, but only if you do further field tests when the base/LTE/Handset equipment is in use to establish if Amateur radio operation is the threat that your purely measurement statics seem to confer. Handsets together with base/LTE logic must be able to deal with multiple handset usage in close proximity without dropout/desense in normal cellular use, so amateur operation may not prove to be the problem you believe it will be.

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?:

I cannot think of any. But without real base/LTE/handsets to test, this is an unusual question to pose.