

General Comments

- *I am a user of these amateur microwave bands*
- *I am a Chartered Engineer, a Fellow of the Institution of Engineering and Technology and a member of the RSGB and associated specialist groups UKuG and BATC*
- *I operate ATV, data, and SSB and am a beacon keeper*
- *I provide Technical Support and test facilities for the UKuG in the North West Area*

Questions and Answers

The release bands (2350-2390, 3410-3475 MHz)

Q1. 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?

A1: Clearly the greater numbers of people gaining will always outnumber the few of us who will lose. This illustrates the great failing of democracy and the need to protect minority interests such as Amateur radio.

Gains and losses cannot be measured in numbers of people. I believe that it is important for the future of our country to have practically experienced microwave engineers and amateur radio is an important part of such training.

Q2. 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?

A2: I am not aware of any other uses.

Q3. Are there further consequences of removing the release bands from amateur licences that have not been considered in our analysis?

A3: I believe that these changes may make analogue ATV use within the narrower bandwidth impractical and therefore this would render some equipment obsolete. When this has occurred with previous changes in the law, for example the use of hand guns, they were compensated for this loss. I understand that there is a European Directive which may cover this issue and provides that nothing shall be taken from any citizen without adequate compensation.

The adjacent bands (2310-2350, 2390-2400, 3400-3410 MHz)

Q4. 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?

A4: Clearly this would eliminate all operation on the 2.3 / 3.4 GHz bands and obsolete all equipment for these frequencies. I fail to understand why this is being considered unless it is to enable cheaper commercial equipment to be used on the proposed release bands.

There is also the question of international communications to be considered. It would not be realistic to ignore international allocations.

Q5. Are there current uses in the adjacent bands other than those detailed in the RSGB's band plan and discussed in Section 3?

A5: I am not aware of any other uses.

Q6. 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?

A6: I have as part of my Technical Support function been involved in the investigation of beacon emissions in the past and will no doubt do so in the future. I have not come across any evidence which shows amateur beacon emissions have been out of band. Filter design is well understood by the amateur fraternity.

More recently the UKuG have been discussing the enlargement of the Technical Support function to ensure through checks that our transmitters are free from out of band emissions. I fully support this approach.
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Q7. 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?

A7: The real problem with this approach is that very often changes in the law have no effect since the problem may well be an unlicensed user.

I have no problem with anyone operating outside their agreed bandwidth suffering withdrawal of their licence. I do not agree with the concept of blanket withdrawal due to some perceived but undefined problem.

Currently as I see it, there are far more listeners than transmitters. Any non amateur use of frequencies allocated is usually quickly spotted. I am sure that the secret to success is openness and good communication between Ofcom and UKuG. There are many technically qualified and experienced members who would be only too pleased to help identify any problems – at no cost – they just need to be asked.

Q8. Do you agree with our preferred option?

A8: This is in my view the best of the three options offered

Q9. Are there additional changes to the Amateur Radio Licence which would assist amateur in lowering the risk of causing harmful interference to new uses?

A9: I do not believe that any change is required. The microwave bands are the most self disciplined group within the amateur fraternity.