

Representing:

Self

Organisation (if applicable):

What additional details do you want to keep confidential?:

Keep name confidential

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?:

This is not conclusive. It depends on the use that the released frequencies are put to, versus the loss of bandwidth to the amateur community. In my experience, a large proportion of professional r.f. engineers are, or have been, amateur radio enthusiasts. So I believe there is a strong driving force for those who start with a hobby interest to develop this into a career in radio innovation and development.

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?:

Amateur radio enthusiasts have always been at the forefront of operating and modulation techniques, Whilst they largely focus on maximising performance of narrow band modes, the loss of 'real estate' for experimenting with wide band and spread-spectrum modes could be an issue in future.

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?:

There are a significant number of UK amateurs, myself included, who have equipment built, tested and operational on the 2.3 and 3.4GHz bands. Loss of these bands would make this equipment and investment largely redundant. Loss would also inhibit experimentation and learning at these intermediate microwave frequencies.

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?:

Again, not to my knowledge.

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?:

'Mitigation' relates to reduction of effect. So if interference were to occur, this suggests that LTE would be designed to be less affected. However, 'reduction' measures would be within the control of the amateur operations and would rely on the frequencies used, timing of operation and directivity and quality of transmitted signals. By their very nature, simplex amateur operation is normally selected to use clear frequencies in order to maximise signal intelligibility whilst minimising transmit power.

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?:

Probably more impractical than onerous. Categorically identifying interference as being from an amateur source, rather than from domestic or commercial RFI sources may be impossible due to their nature. There is also the occasional risk of more distant interference from overseas sources due to tropospheric propagation.

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

If the option is for the amateur community to retain adjacent bands, rather than lose both released and adjacent, then yes. Narrow band operations and some limited wide band operation would still be possible. Use of the released band would also lead to future surplus equipment that could be adapted for use on the adjacent bands.

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 believe that the greatest opportunity for lowering the risk is in good design of the equipment employed for new uses. This includes the linearity and dynamic range of rf stages prior to digitisation and the front-end filtering employed in the equipment. Transmit power could be

restricted for amateur operation, although most operation would only use modest power anyway, other than those who are attempting moon bounce operation (and their transmissions are largely aimed skywards).