London 2012 Olympic Games and Paralympic Games: Draft Spectrum Plan Consultation

Response by the Radio Society of Great Britain

August-2009

Introduction

This response to the above Ofcom consultation document is from the Radio Society of Great Britain (RSGB, www.rsgb.org.uk) on behalf of its members and the wider Amateur Radio community. The latter includes both individual operators as well as a variety of special interest groups whose spectrum this document involves.

RSGB is recognised as one of the leading organisations in the world in the field of amateur radio. It collaborates with its fellow national societies via the International Amateur Radio Union (IARU) through IARU Region-1 (www.iaru-r1.org).

Amateur radio is a science based technical hobby enjoyed by over three million people worldwide. From a statutory point of view it is fully recognised by the International Telecommunication Union (ITU) as a service and is listed in the ITU Radio Regulations as the Amateur Service and the Amateur-Satellite Service.

Over the past few years the Society has liaised with Ofcom on 2012 matters with respect to both spectrum requirements and our own interests in regard to Special Event Stations etc that would form part of the associated cultural activities. In addition to this response, we would be pleased to continue such discussions, both with Ofcom, or any other stakeholder who has an interest in this topic.

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RSGB, August 2009
General

The 2012 Games are a premier international event and inevitably need significant spectrum resources and equipment to facilitate broadcasting, security, press/media, officials etc.

Many of the consultation questions are specific to particular communities of interest, so below we provide a number of our own points

Spectrum Issues

We appreciate the breadth of the document that and issues that Ofcom has laid out and note that a series of amateur bands are included in the options. We ourselves like to highlight that some existing Amateur allocations (which are also listed in the Ofcom draft plan) need to be retained for use near venues for:-

- Increased use of VHF/UHF voice repeaters by UK amateurs and a large number of licensed foreign visitors
- Use of certain bands by nominated Amateur Special Event Stations for the Cultural Programme
- Use of certain channels by Raynet etc for coordinating general assistance

Monitoring/Enforcement

To underpin the technical setup and success of the events and to deal with correct return of temporary spectrum, we request that Ofcom provides additional detail and resources with respect to the issue of registration and monitoring of spectrum use, particularly for PMR/walkie-talkie class equipment in the VHF/UHF bands so that channels are released back to existing users without ongoing problems.

Spectrum Information

Once the specific details are confirmed of bands/channels where either coordination with existing users, or even exclusion, is required we suggest that Ofcom makes this available on a band by band basis in readily understandable form. For example, is a Google map webpage configured using defined centres and 50km radii around the venues.
Questions & Answers

Consultation Questions & Answers

Approach

Question 2. Do you have any comments on the scope for reducing demand by using fibre-wireless networks within venues?

and

Question 4. Do you have any other comments on the scope for reducing demand by relying more heavily on wired communications?

In regard of Q2 & 4 we agree that maximising use of wired and existing infrastructure can greatly assist in reducing additional spectrum requirements, particularly for broadcasters (eg cameras, audio etc). Furthermore for some venues, notably the football grounds, Wimbledon etc which regularly hold and screen major events we look forward to hearing whether existing/planned facilities would be sufficient to totally obviate the need for additional spectrum

Question 7. Do you have any comments on the scope for maximising supply by using higher-frequency spectrum?

We believe there are many opportunities (licensed and exempt) for mm-Wave bands to facilitate data links etc and minimise pressures on lower frequencies

Private mobile radio

Question 13. Do you have any other comments on our assessment and proposals for land radio?

We note the potential use of the Amateur 144 and 430MHz bands and look forward to more detailed discussion on this. – see also our answer to Q16 below

Audio links

Question 16. Do you have any comments on our assessment and proposals for talkback?

We note that the amateur 70cms band (430-440MHz) is included in Table-8, which we share with MoD and has a significant amount of amateur repeater infrastructure. We would also highlight that this band also has a variety of uncoordinated licence-exempt SRDs (some of which as Ofcom is aware have been known to generate significant harmful interference in the London area). For a variety of reasons we do not believe this band is a good choice for broadcast-critical applications

Video links

Question 18. Which bands would you prefer to use for wireless cameras?

We note that a number of these bands overlap with amateur microwave use and look forward to further discussion in this regard
Other guaranteed services

Question 28. Do you have any comments on our assessment and proposals for WLANs?

We are aware of Ofcom research on WiFi congestion in urban areas and agree that care must be taken, bearing in mind that the standard Wifi bands also have some licensed Amateur and Amateur Satellite use as well.

Football venues

Question 29. Do you have any comments on our assessment or proposals for spectrum at the six football venues?

As per our general comments earlier we believe such venues are used to handling major events and not require significant amounts of additional spectrum.

Cultural events

Question 30. Do you have any comments on our assessment and proposals for cultural events?

See our comments above regarding our own needs for Special events stations.

Operational issues

Question 37. How can the use of licence-exempt equipment best be managed?

We believe it would be wise to discourage use of 433MHz exempt equipment for 2012 venues.

Question 39. How can interference management be most effective in ensuring the successful running of the London Games? Are there other measures we should consider implementing?

Well resourced and pro-active monitoring and enforcement arrangements are needed.