

Ofcom Consultation:

## Updating Wireless Telegraphy Licence Exemptions

### Response by the Radio Society of Great Britain

**March, 2025**

The Radio Society of Great Britain (RSGB, [www.rsgb.org](http://www.rsgb.org)) provides our response and comments related to this wide ranging Ofcom consultation on updating a variety of wireless telegraphy exemptions.

Whilst we have a strong interest in Topic-9 for visiting amateurs, we have noted that several other topics have proposals that overlap amateur allocations. Consequently we have also included comments on the other topics of most interest.

Whether it is this response, or related matters, we welcome further engagement.

*RSGB, March-2025*

**Reference:** Consultation: Updating Wireless Telegraphy Licence Exemptions, January-March-2025

<https://www.ofcom.org.uk/spectrum/radio-equipment/consultation-updating-wireless-telegraphy-licence-exemptions/>

## **Topic-8: Testing and Development under suppressed radiation conditions**

*Question 11: Do you agree with our proposals to extend the existing licence exemption for testing and development under suppressed radiation conditions? Please give reasons and provide evidence that supports your comments on the proposals.*

*Question 12: Do you agree with our proposals to extend the application of Regulation 7 of the 1989 Regulations i.e. that equipment users must conduct measurements to ensure that their equipment does not exceed the limits on spurious emissions, to anyone relying on the proposed exemption in the additional bands. Please give reasons and provide evidence that supports your comments on the proposals.*

*Question 13: Do you have any other comments on our proposals to make amendments to the licence exemptions for this testing equipment?*

Whilst we note that the limits proposed have been in use for some time and have applied to indoor or suppressed conditions (such as anechoic chambers), they cover substantial frequency ranges including HF and higher amateur allocations.

Frequencies below a few gigahertz have relatively low building attenuation and can easily penetrate from within a building to the outside.

Therefore any exemptions, and accompanying guidance should be very clear that such suppressed conditions and/or verification by measurement continue to apply - and thus avoid the potential for misunderstanding and misuse that may lead to increases in harmful interference.

## Topic-9: Amateur Radio (Full) (Temporary Reciprocal)

**Question 14:** *Do you agree with our proposals to extend the existing exemption for radio equipment operated by visiting amateur radio users, to cover use by those on short visits from countries with which we have bilateral reciprocal licensing agreements?*

In general RSGB supports this new approach which will facilitate visits by amateurs from those specific countries. During the consultation period we have sought advice and updates from a number of the countries in scope and found that this was generally a welcome move.

As Ofcom is aware, the specific reciprocal licensing agreements that are currently referred to by the country annex in Ofcom Form OfW346 are quite variable and rather dated in their origins. In some cases they have not kept pace with licence changes in the countries that are in scope.

Two examples are:

- Cayman Islands who are listed in OfW346 as a bilateral, but who recently joined the broader CEPT T/R 61-01 agreement in October-2024
- Thailand – where Advanced Licences (ie above Intermediate) are now part of their system

Separately we have also noted how a change to Australian amateur licensing mechanisms also resulted in needing a consequential editorial change to T/R 61-01.

We therefore look forward to the detail of the draft exemption regulations, and any related Ofcom amateur policy/guidance updates, where flexibility to accommodate either future licence changes by countries in scope, or potentially extra countries, on a bilateral basis, are of interest.

**Question 15:** *Do you agree with our proposals to define a temporary visit as a maximum period of three months? Please give reasons and provide evidence that supports your comments on the proposals.*

We agree that this is both a reasonable period and keeps any new arrangement more consistently aligned with the three month time period in recommendation CEPT T/R 61-02.

## Topic-10: 5.8 GHz (5725-5850 MHz) Fixed Wireless Access (FWA)

**Question 16:** Do you agree with our proposal to introduce a new licence exemption for Fixed Wireless Access equipment operating in the 5725-5850 MHz band? Please give reasons and provide evidence that supports your comments on the proposals.

The RSGB has concerns with this proposal.

As the consultation notes in Para-10.4, the amateur and amateur satellite services have secondary allocations in this frequency range – and furthermore we do not have the degree of spectrum access and flexibility in the UK Amateur licence that FWA users, and amateurs in other countries, would have for alternative frequency choices.

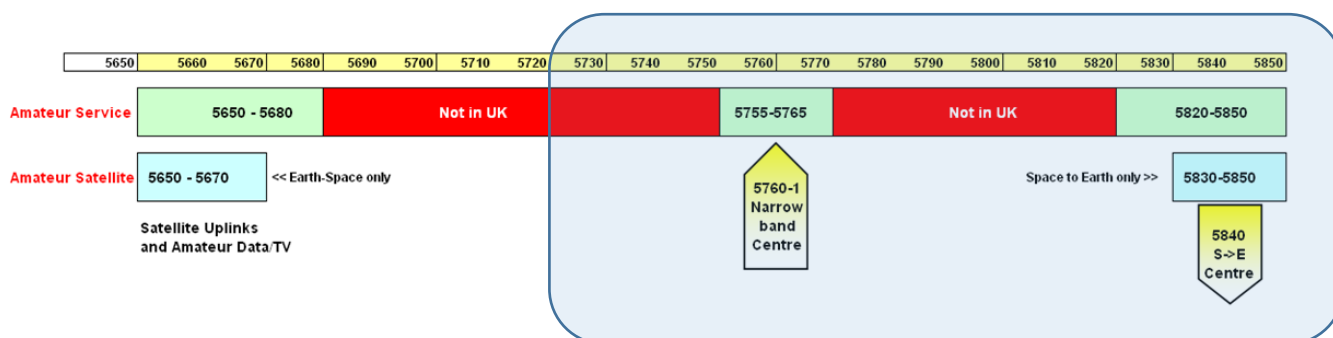
Whilst noting the power and other technical parameters for FWA, we would like to draw attention that our most sensitive weak-signal bands are also within the 5725-5850 MHz range.

Specifically, amateur terrestrial weak-signal narrowband usage and propagation research is centred on 5760MHz; and amateur satellite downlinks at 5840MHz.

The usage and frequency centres are recognised by CEPT allocation footnotes ECA17 and ECA23, which request administrations to facilitate the reception of amateur emissions with minimal power flux densities in a pair of narrow sub-bands at 5755-5765 and 5830-5850 MHz.

Furthermore, such amateur applications / frequencies are globally harmonised in all ITU regions.

Therefore we would appreciate Ofcom providing clear guidance to FWA users referring to this, to guide their channel selection towards more compatible alternatives within the overall 5725-5850 MHz frequency range.



**UK 5GHz amateur service and amateur satellite service allocations, usage summary and restrictions**