General Comments

- *I have held a Full Amateur licence for fifty years and have built and experimented with antennas, transmitting and receiving equipment on these frequency bands for in excess of 25 years.*

- *I am a member of the UK Microwave Group specialist group*

- *In addition to my personal use of these bands I hold NOVs for microwave beacons GB3LES (2320.955MHz) and GB3LEF (3400.955MHz)*

- *At these frequencies there is very little off-the-shelf equipment available and in consequence the self-training aspect of amateur radio is considerable.*
  In my professional experience, i.e. forty years in a large UK defence electronics company, it was often the case that the senior RF/Microwave engineers were also radio amateurs. With additional reductions and restrictions on access to these frequencies the stimulating challenges provided in developing amateur radio equipment will be inhibited with the consequential loss of experience that can be 'read-across' into the commercial application.

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?

I do not understand how it is possible to make any quantitative comparison of the value for amateur use which is non commercial, and the benefits to UK consumers which are essentially commercial in nature.

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?

No comment as I believe that current usage has been adequately considered

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

None that I can identify.

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?

Access to these bands is vital to existing users such as myself who have invested considerable time and money in developing equipment that would be rendered useless because it could not be re-tuned to other bands.

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

None that I am aware of

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?

No response because I believe that the technical skills of amateurs currently using these frequencies is such that appreciation of possible interference sources is already in place and consequently is tested for during the design and development of equipment.

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?

Do not agree because there are existing powers available to OfCom. It would need to be demonstrated that these existing powers have not been able to adequately deal with reported interference, if any, in these bands

Q8. Do you agree with our preferred option?

A8: Yes agreed

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?

No comments because the amateur radio licence already places on the holder a non-interference requirement.
Any lowering of risk would be best achieved through education in the measures of best technical practice, this is more likely to be achieved from within the amateur radio community.