Title:

Mr

Forename:

Surname:

Representing:

Organisation

Organisation (if applicable):

Telecom Synergy

Email:

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:

My concern is for the adjacent commercial satellite band, 3.6-4.2GHz which already suffers massive interference caused by WiMAX, that should the amateur 13cm band be released for terrestial use, the use of the satellite band will become even more disrupted than at present. The C-band hemi and global beams are essential for backhaul links into Africa and parts of Asia. Especially in regions where the rain attenuation excludes the use of Ku and Ka band as an alternative. Many of my call-outs to clients are due to increasing levels of terrestial carriers below 3.6GHz which severely disrupt communications. By allocating the 3.4GHz amateur band to terrestial traffic, this will preclude many UK satellite operators from VSAT markets, or place them at a significant commercial disadvantage.

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?:

In the 2.3 GHz band, I can understand the commercial advantage. "Releasing" (or more correctly "reallocating") the 3.4GHz band has severe disadvantages and financial repercussions both commercially in the UK as well as abroad.

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?:

In the 3.4 GHz band, the current WiMAX interference and lobbying is a major source of problems for the entire telecoms industry.

Question 3: Are there further consequences of removing the release bands from amateur licences that have not been considered in our analysis?:

Given the past behaviour of the WiMAX lobby, who have camped in the 3.4GHz amateur band for years, the 'release' of 3.4GHz for other users will most likely result in the WiMAX lobby moving further into the 3.6-4,2 GHz satellite band. Recent measurements I have taken in Africa indicate the presence of WiMAX up to 4 GHz now. Releasing the 3.4GHz amateur band for commercial terrestial use will create an unnecessary precedent for (often unlicenced) WiMAX equipment to interfere with other services. I have seen examples of air traffic and airport systems being severely hampered in this way. My preference would be to leave 3.4GHz for amateurs and the WiMAX lobby, primarily to prevent them moving further into the satellite bands. Any ruling in the UK sets a precendent (because equipment then comes on the market for these frequencies).

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?:

See above. In the case of 3.4 GHz, this has consequences for the main satellite operators (Intelsat, Eutelsat, SES) and serious consequences for VSAT operators terminating traffic in the UK.

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?:

Yes. The commercial satellite band 3.6-4.2GHZ used for GSM backhaul, TV links, Internet and PSTN traffic. This band already suffers badly from WiMAX at 3.4GHz.

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?:

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?:

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

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?:

Likely yes. In general, amateurs make very good neighbours.