

# RADIO SOCIETY

of Great Britain

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Sherington Gaskin,  
Enforcement Policy Advisor,  
Riverside House  
2a Southwark Bridge Road  
London  
SE1 9HA

24<sup>th</sup> May 2010

Dear Sherington,

## 6dB Guideline trial

At our meeting on March 18<sup>th</sup>, Ofcom asked RSGB to provide considered comment on the 6dB guideline trial for interference resolution, which had been operated by Ofcom over the last few months.

The purpose of this letter is to provide that input to Ofcom.

Firstly, I wish to clear up a misunderstanding. Immediately following the 18<sup>th</sup> March meeting, there were reports circulating from Ofcom that RSGB had agreed to the use of the 6dB guideline. This is not correct. It is quite true that Ofcom's minutes of the 2009 Bedford meeting at which Ofcom explained its plans for the trial include the following paragraph:

*On the issue of assessing interference, Jim Loughlin said that Baldock's Mobile laboratory was UKAS accredited. He informed the meeting that for a trial period of 3 months, the criterion that would be used as a threshold for interference to an Amateur installation would be a measurement of a figure of at least 6dB above the noise floor in a bandwidth of 9 kHz - detector peak or average if SSB transmission. The measurement would be made using the Amateur's antenna installation and one of Ofcom's calibrated receivers. The meeting welcomed the process.*

However, at a subsequent meeting (November 2009) the following minute appears:



*The Agenda V.2-11-09 was approved. With regard to the approval of the minutes, Colin Thomas questioned the accuracy of the last para of section 5. After some discussion and a suggestion by Dave Wilson it was agreed that the last sentence "The meeting welcomed the process" should be deleted. With this change the minutes were approved.*

I hope therefore, that the RSGB's position on the introduction of the trial is clear – it was an Ofcom initiative, and the RSGB's position was simply to note that.

Looking forward, however, the Society believes it appropriate to provide Ofcom with some input on the trial and in the following clauses we offer some points for Ofcom to consider in pondering its future strategy in this area.

- 1 The Society understands that where interference is being experienced by radio amateurs, it is often only detectable when using the amateur's own antenna. We therefore believe that the Ofcom approach of using the amateur's own antenna, rather than a less sensitive reference antenna, is helpful in establishing the true extent of the interference being experienced.
- 2 Ofcom has helpfully provided a copy of the guideline issued to its field staff in respect of the 6dB guideline. We question, however, the notion of protection coming simply from the EMC Directive. This is not our understanding of the legal position. In addition, flattering though it is, an Ofcom internal document should not, we believe, rely on an RSGB publication for support and explanation, especially where that document was itself cleared with Ofcom before publication. We would be very happy to help you redraft this section.
- 3 We note that where the interference source results in an increase in noise level of 6dB or more, Ofcom field staff are encouraged to trace and rectify the problem. We welcome this. A 6dB increase in noise level is more than adequate to cause harmful interference to radio communications.
- 4 However, we note that where the interferer causes an increase in noise of less than 6dB, the matter is referred to a senior engineer for guidance, and exercise of discretion. The RSGB believes that the guideline should make clear what factors the SFE should take into account in exercising this discretion. There is evidence from the trial, that 6dB has been interpreted as a "rule" and whilst this is not what the Ofcom documentation states, it is clearly not acceptable that interference causing an increase in noise level of less than 6dB should be regarded as acceptable in all cases. The RSGB believes that the criteria of Harmful Interference in conjunction with the requirements of the EMC Regulations and /or the relevant Wireless Telegraphy Act, need to be taken into account.

- 5 There is also the question of “6dB above what ?”. The inevitable result of the proliferation of devices that fail to meet the essential requirements of the EMC Directive and its UK transposition, will be to cause a progressive deterioration of the noise contour, particularly in the urban and sub-urban environment. There is therefore a paradox about what the baseline noise level is, above which the 6dB is measured, and we would welcome clarification on this.

We have in mind a situation as follows: A local interferer, surrounded at a distance by further interferers at more than 6dB below the level of the local interferer, but nevertheless causing a greater than 6dB increase to the background noise. The RSGB contends that these interferers too (where they can be discretely identified) should be subject to investigation and rectification, with the objective of approaching a reasonable received noise environment.

In summary, the RSGB welcomes the concept of a guideline which advises field staff on the conduct of interference investigations, but feels that the current document needs some amendment.

The RSGB would be happy to enter into constructive discussions to further this work by Ofcom, as we believe it is in the interest of both parties to have a protocol agreed which governs the proper handling of interference cases. However, the current one falls short of what is needed.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D.F. Beattie'.

**Donald F Beattie**  
**Director**