

**Notice of proposal to make the Wireless Telegraphy
(Automotive Short Range Radar) (Exemption) Regulations 2013**

**Joint response from the Radio Society of Great Britain,
UK Microwave Group, Amsat-UK and BATC.**

May 27th 2013



Introduction

This response is a joint one to the above Ofcom proposal from the Radio Society of Great Britain (RSGB, www.rsgb.org) and its national affiliates who have microwave spectrum interests - Amsat-UK (www.amsat-uk.org), UK Microwave Group (UKuG, www.microwavers.org), and the British Amateur Television Club (BATC, www.batc.org.uk).

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.

The amateur and amateur satellite services have ITU Primary & Secondary allocations in the 24GHz and the 77/79GHz bands used by license-exempt automotive radar. Over several years we have therefore taken a keen interest in automotive cruise control and short range radar (SRR) and related Ofcom/CEPT consultations.

We note that there is only one formal question but take the opportunity to comment on other issues/intentions related to this topic.

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RSGB, Amsat-UK, UKuG & BATC, May 2013

Glossary/Acronyms

SRR24G: Short Range Radar in the 21.65 to 26.65 GHz range

SRR26G: Short Range Radar in the 24.25 to 26.65 GHz range

SRR79G: Short Range Radar in the 77 to 81GHz range

WLAM: Wideband Low Activity Mode in 24.25-24.5GHz

Questions and Answers

Question

Do you agree that the drafting of the Proposed Regulations correctly gives effect to the European Commission's Amending Decision referred to in this document - and to the other intentions set out in this document?

Answer:-

Proposed Regulations

With regard to the regulatory change itself, we strongly support Ofcom's timely implementation of the change, which will effectively see:-

- a) Revocation of newer radars out of the Primary Amateur and Amateur Satellite allocations (apart from spares/repairs for existing installations)
- b) Restoration of the adjacent 23.6-24GHz Passive band below (where a breach of ITU- Radio Regulation footnote RR5.340 had occurred)

General Intentions

A mandatory regulatory update such as this (with no other specific questions) is not the best mechanism for gauging intentions

We are satisfied that this amendment along with the new time-limited rules covering SRR26G systems is helpful for the existing 24GHz Primary users and should provide sufficient time and encouragement for the introduction of newer 79GHz SRR. Furthermore the industry also has options based on a permanent provision for 24GHz WLAM (wideband low activity mode) as provided in ERC 70-03, which was also introduced as part of the SRR24G review.

The amateur and amateur satellite service has a Primary allocation at 77.5-78GHz, which will be affected by increased use of 77-81GHz SRR. Whilst acknowledging the potential benefits of SRR, we note that both this and alternative technologies should continue to be on a license exempt (non-protected non-interference basis). We take this opportunity to state that we would oppose any change to the existing European 79GHz decision, 2004/545/EC. In particular we would be concerned with any upgrade of SRR status based on the unnecessary and non-proportionate change being considered under WRC-15 Agenda Item 1.18. Automotive radars are classic examples of short-range devices (SRDs) for which, in general, allocations are neither essential nor appropriate and they should remain on a non-protected, non-interference basis.