



Response from the Radio Society of Great Britain

September-2012

Introduction

This response to the above DCMS seminar and consultation paper from the Radio Society of Great Britain (RSGB, www.rsgb.org.uk) on behalf of its members and the wider Amateur Radio community. The latter includes both individual operators as well as a variety of special interest groups including those with significant microwave spectrum interests - Amsat-UK (www.uk.amsat.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.

It is worth noting that spectrum used by Amateur activities embraces Culture, Media and Sports as well as skills development, innovation and emergency communications. RF skills are a very rare commodity yet wireless will underpin increasingly valuable activity. Long term certainty for spectrum for the Amateur services will thus underpin national STEM goals as well as Innovation and Growth.

This response follows previous submissions to DCMS in July 2011 on:-

Enabling UK growth – Releasing public spectrum: Making 500 MHz of spectrum available by 2020

And

Response to DCMS open letter – A Communications Review for the Digital Age

These are also available online at:-

<http://www.rsgb.org/committees/spectrumforum/spectrum-forum-papers-and-consultations.php>

Permissions is granted to place the whole of this response in the public domain

Q1 Could Ofcom's duties be clarified in relation to spectrum assignment, and if so how?

There are services including the Amateur and Amateur Satellite Service which are by definition inherently non-commercial in nature where market mechanisms are not appropriate – and in fact potentially quite damaging in the case of our secondary shared allocations (such as 2.3-10 GHz)

We therefore not only support the sentiment in Para-1.10 regarding the need for administrative assignments, but ask for a broader and more consistent recognition of this in common with other non-commercial users such as the space science, astronomy, meteorology, PMSE etc

Q2 Does Ofcom have the necessary tools to address SME needs, for example by facilitating through a third party 'band manager', who would acquire spectrum and enter into leasing arrangements with companies interested in accessing spectrum?

Should that third part band manager operate within a band we also share in, then we would expect that there are clear duties and responsibilities with Ofcom oversight

Q3 [Ofcom's duties & Powers, Incentive Auctions that compensate licensees] Would this bring benefits in the UK?

The amateur community is currently facing expensive relocation as part of the 2.3GHz band release. We note for the Digital-TV Dividend a compensation and retuning scheme for PMSE was created (despite it not even being a recognised ITU service, which we are). We therefore believe there that there should be consistency and such a mechanism applicable to amateur systems which have long operated without problems, in order to compensate and assist with such frequency migration situations.

Ofcom Powers & Duties Additional Comment: The DCMS paper does not mention this, but Ofcom's default powers and duties are insufficient to protect the electromagnetic spectrum. This was in evidence when additional temporary powers had to be used to protect the Olympics from interference; and the ongoing complexities on EMC regulations and enforcement. EMC and compliance issues can fall to BIS and trading standards when non-radio equipment (such as PLT, Plasma TVs, unsuppressed power supplies etc) cause interference to radio users/equipment – A more unified and effective approach is required.

Q4 What views do you have of the following possible measures that could be put in place to encourage trading:

In the paper, Suggestion-3 (Compulsory purchase/eviction), is an extreme measure that would need to abide by the ITU Radio Regulations; and have due process and compensation in line with the sentiments expressed in Q3.

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Q5 What would be the impacts of changing the amount of and approach to licence-exempt spectrum in order to improve innovation and growth, and what evidence is there to support this?

We accept that license-exempt spectrum can support valuable services such as Wi-Fi despite its causing considerable harmful interference to licensed users (such as Amateur TV and Satellites in 2.4GHz).

From a raft of interference incidents that have affected the UK public in the 433 MHz band such as jammed car door locks (and are now threatened in the previously well-planned 868MHz band due to LTE), it is clear that license-exempt spectrum needs careful technical planning and better device performance. We favour recent CEPT initiatives such as harmonising a part of the 900MHz spectrum with the USA for RFID, but remain highly concerned regarding the use of long range HF frequencies such as 13MHz for license-exempt use.

It also requires greater public education so there is a greater recognition that license-exempt devices are not a protected or guaranteed service.

Education may be the role of governments/regulators but the technical solutions are the domain of thorough spectrum engineering expertise - such as the work undertaken by CEPT SE24. We would recommend considerable caution and couple this with a marked improvement to the performance and selectivity standards of license-exempt receivers.