



Ofcom Consultation on More Radio Spectrum for the Internet of Things

Response from the Radio Society of Great Britain

November 2015

This response to the above Ofcom consultation document is from the Radio Society of Great Britain (RSGB, www.rsgb.org) on behalf of its members and the wider Amateur Radio community in the UK. The latter includes both individual operators as well as a variety of special interest groups, including the British Amateur Television Club (BATC, www.batc.org.uk) who have a particular interest in this frequency range.

The 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.

Amateur radio is a hobby that promotes experimentation and innovation in radio techniques and propagation. As Ofcom is aware we have used the opportunity of VHF Spectrum Release to pioneer innovative digital voice/data/media use such as Reduced-Bandwidth Digital TV courtesy of a separate 146-147 MHz NoV arrangement and have a similar interest in the newer 71 MHz band courtesy of the Special Research Permit facilities. Whilst the latter are at an earlier stage we would be delighted to discuss our progress and findings with Ofcom when convenient.

Questions and Answers

Q1. *Do you agree that the spectrum we have identified (in figures 4.2 and 4.3 above) is suitable for M2M applications for remote and rural locations? Please provide as much information as possible on likely applications.*

A1 We expect that the vast majority of IoT applications will be in other bands due to market, technical or harmonisation reasons, but do recognise that there may also be some specialist rural applications or other reasons for low-band VHF usage.

As radio amateurs we can only comment based on our own experience (including our main bands at 50 and 70 MHz). These frequencies pose both large antenna and electromagnetic environmental challenges. Regarding the latter we more specifically refer to our experience with variable (and occasionally sporadic) propagation and background noise. As Ofcom indicate in 4.16, manmade noise is a key factor. Even in rural areas this can still be significant, from our experience near some farm buildings, wind farms and other equipment installations.

We also note from the Ofcom consultation document that Scotland with a large rural area is also one where retained use by the Scottish Government may unfortunately inhibit new uses and greater assignment efficiency. Hopefully Ofcom can make further progress and investigate if current spot frequencies could be reassigned to band edges (or elsewhere) to facilitate easier frequency release and re-use.

Q2) *Do you agree with our analysis that encouraging new IoT uses in the bands 55.75625-60MHz, 62.75625-64.8 MHz and 64.8875-66.2 MHz, 70.5-71.5 MHz and 80.0-81.5 MHz should still leave sufficient spectrum to meet demands for Business Radio in the VHF range?*

A2) No comment

Q3. *Do you think the conditions associated with the current range of BR licences available now should change to facilitate new IoT services uses? If you do, what should these changes be?*

A3) No comment

Q4) *Do you think we should create a new licence product specifically for IoT services*

A4) No comment