

## Ofcom further Consultation: Supporting increased use of shared spectrum

24<sup>th</sup> July to 18<sup>th</sup> September 2024

### RSGB response

Question	Your response
<b>Question 1: Do you have any comments on our proposal to make Medium Power licences (42 dBm EIRP, up to 10m height) commonly available in urban areas across most of the UK, for the 3.8-4.2 GHz and 1800 MHz bands?</b>	Confidential? – N  No comment
<b>Question 2: Do you have any comments on our proposed balancing measures:</b> <b>i) to continue to only grant Medium Power licences in the Greater London area (as defined in our mm Wave work) by exception, applying the ‘premises sterilisation’ test?</b> <b>ii) to apply a 100 MHz limit to the amount of spectrum a licensee can transmit at Medium Power in a particular urban area?</b> <b>iii) to apply a new price as part of this liberalisation, set at £160 per 10 MHz for Medium Power licences in urban areas?</b>	Confidential? – N  No comment
<b>Question 3: Do you agree with our proposal to remove the TRR in relation to Low Power outdoor base stations in 3.8-4.2 GHz?</b>	Confidential? – N  No Comment
<b>Question 4: In relation to our impact assessment, do you agree with our assessment of the potential impact of the further proposals we are making?</b>	Confidential? – N  The Impact Assessment appears to omit other 2.3GHz users. See also our reply to Q7
<b>Question 5: In relation to our equality impact assessment, do you agree with our assessment of the potential impact of the further proposals we are making on specific groups of persons?</b>	Confidential? – N  No comment

Question	Your response
<p><b>Question 6: In relation to our Welsh Language impact assessment, do you agree with our assessment of the potential impact of our further proposals on the Welsh language?</b></p> <p><b>Do you think our further proposals could be formulated or revised to ensure, or increase, positive effects, or reduce/ eliminate any negative effects, on opportunities to use the Welsh language and treating the Welsh language no less favourably than English?</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>Question 7: Do you have any further comments on our proposals?</b></p>	<p>Confidential? –N</p> <p>The RSGB notes the proposal to offer spectrum in the range 2320 – 2340 MHz for indoor system shared access. This range is within the UK amateur licence schedule range 2310 to 2350 MHz for the Intermediate and Full licences. In particular the range 2320 – 2322 MHz is identified as the preferred narrowband centre of activity for weak signal amateur operations consistent with the internationally agreed band plans. The shared access systems are expected to operate in a bandwidth that would completely cover this range.</p> <p>The RSGB appreciates that the indoor usage condition has the potential to minimise interference to the outdoor amateur weak signal receivers. However buildings may not perfectly contain the emissions which could have the potential to increase the noise floor in the amateur receivers up to several kilometres away. These emissions are likely to operate 24/7 and the continuous elevation of the noise floor could impact the viability of certain weak signal applications such as earth-moon-earth operations for example.</p> <p>The RSGB appreciates the initiative to encourage innovative services and application through easy access to this shared spectrum. However, there has not been any specific consultation with the amateur services in the UK on this choice of frequencies and the situation could be improved to everyone’s benefit if a modified range such as 2325 – 2345 MHz were offered instead. Radio amateurs have successfully shared spectrum with many other services but these tend to be those employing a low usage factor.</p>

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	<p>Additionally RSGB also highlights that amateur usage of the 2.3GHz band was the topic of a specific consultation in 2013 under the Ofcom PSSR programme. We would be pleased to discuss a review/relaxation of the strict guidance from that time.</p>