



Ofcom Consultation:

Enabling short notice, short duration licences in 2.3 GHz

Proposals for a new approach to temporary spectrum access in 2320-2340 MHz

Response by the Radio Society of Great Britain

August 2025

This response to the above Ofcom consultation 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 UK Microwave Group (UKuG), AMSAT-UK and British Amateur Television Club (BATC) who have a particular interest in the frequency range in this consultation.

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.

Having already seen the unwelcome opening of this frequency range to indoor applications in the original 2024 consultation, we consider this new step as unwarranted 'mission creep' given that it was not in scope at the beginning of the process.

We also take this opportunity to remind Ofcom that we also await an update for our own operators to replace the 2014 PSSR conditions and registration system.

In summary the RSGB is disappointed that this proposal will bring amateur operators and the shared access operators into direct conflict especially in the range 2320 – 2322 MHz and enclose our detailed comments overleaf.

RSGB, Aug-2025

Consultation Question Responses:

1) Do you agree with our proposal to make available additional short term, fast turnaround access to 2320-2340 MHz? If not, please give your reasons.

No. The RSGB is disappointed that this proposal will bring amateur operators and the shared access operators into direct conflict especially in the range 2320 – 2322 MHz. This will create harmful interference to the amateur service resulting in interference complaints and acting as a disincentive to amateur experimentation in the band.

In the RSGB response to the previous 2024 consultation (“Shared access to spectrum supporting mobile technology”) indoor systems were proposed in the range 2320-2340 MHz and the RSGB highlighted that this range is within the UK amateur licence schedule range 2310-2350 MHz for the Intermediate and Full licences. In addition the RSGB highlighted that the range 2320-2322 MHz is identified as the preferred narrowband “weak signal” centre of activity consistent with the internationally harmonised band plan. The proposed shared access systems based on IMT technology will occupy a bandwidth that will completely blanket this range for the entire time the IMT system is active.

The RSGB felt that the original indoor usage conditions could to some extent mitigate the potential for interference to the outdoor amateur weak signal receivers.

In the previous response the RSGB proposed a shift of the shared access spectrum to the range 2325 – 2345 MHz to avoid the co-frequency clash for weak signal operating. There is no consideration of this proposal given in the December 2024 statement from Ofcom.

The shared access signals based on 4G or 5G IMT technology will occupy a wide bandwidth which in a narrow band receiver blanket the entire receiver passband and completely suppresses the possibility to receive weak amateur signals including propagation beacons and earth-moon-earth (EME) signals, as well as other remote weak terrestrial stations.

Once again the RSGB proposes that these shared access systems could operate in adjacent frequencies in the range 2325 – 2345 MHz to avoid the co-frequency clash for weak signal operating. This range remains consistent with the IMT frequency band and covered by the 3GPP standards.

2) Do you agree with our proposed coordination approach, to ensure protection of incumbent users while facilitating quick access? If not, please give your reasons.

No. There is no coexistence assessment or coordination procedure for the protection of authorised amateur radio users. Out of band limits are irrelevant when the operations are co-frequency. The consultation document merely states that all operation is on a non-interference non protection basis. However the RSGB does not understand how this basis can protect any party. There will be no opportunity to address any interference that occurs to either amateur users or shared access users.

It is unlikely that the shared access users will detect interference from a narrow band amateur user. However a weak signal amateur user will be prevented from operating due to the excessive received interference even away from the antenna main beam heading.

3) Do you agree with the proposed technical conditions, including the proposed power limit and Out-of-band emissions?

No. At the licensed base station power the station of a typical amateur operator will receive interference many tens of dB's above the receiver noise floor across the whole harmonised amateur weak signal working part of the band.

We note that base stations can up to 10m high and there is no cap to prevent successive 14-day licence periods. Excess height and extended licence periods needs to be clearly addressed.

We are therefore concerned that problems will occur at distances up to and beyond several tens of kilometres. No separation distance is feasible. The proposed OOB limits are irrelevant to weak signal operators in the 2320-2340 MHz range.

4) Do you agree with the proposed licence terms including:

i) The non interference, non protection clause.

No. The RSGB does not understand how this clause can protect any party. There will be no opportunity to address any interference that occurs to either amateur users, or shared access users.

ii) The 14 day maximum licence duration.

The RSGB is concerned that new licences could be applied for to follow the 14 day duration at the same location leading to prolonged interference to the amateur service.

iii) Our proposed fee structure.

No comment.

5) Do you have any other comments on our proposals? If appropriate, please include comments on any use cases which you envisage, and how far these would align with the licence conditions we are proposing and the spectrum available.

The RSGB believes that radio amateurs will not be able to avoid levels of harmful interference that will completely disrupt amateur operation during the shared access licence duration.

6) Do you agree with our Impact Assessment of the potential impacts of the proposal we are making?

No response.

7) In relation to our Equality Impact Assessment, do you agree with our assessment of potential impacts of the proposals on specific groups of persons?

No. The RSGB believes that the statement "...We consider that the risk to amateur radio operators is minimal.." is based on misinformed understanding of amateur operations and common practices in the band. It has been arrived at without any due consideration of the harmonised band plan for amateur operations that are international in their nature.

8) In relation to our Welsh Language Impact Assessment, do you agree with our assessment of potential impacts of the proposals on Welsh language speakers?

No comment

9) Do you have any further comments on the proposal or anything else set out in this Consultation?

The RSGB is disappointed that there has not been any direct consultation with the amateur community in the development of these proposals.