

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: WRC-07 Agenda Item 1.4
Candidate bands under consideration at WRC-07 for IMT

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Amsat-UK, UK Microwave Group & BATC

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Name ___Murray Niman G6JYB___ Signed (if hard copy)

WRC-07 Agenda Item 1.4
Candidate bands under consideration at WRC-07 for IMT

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

March 27th 2007



Introduction

This response is a joint one to the above Ofcom discussion document from the Radio Society of Great Britain (RSGB, www.rsgb.org.uk) and its national affiliates who have 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.

We thank Ofcom for this further opportunity to comment, albeit at a relatively late stage in the WRC preparatory process.

We would be pleased to provide any additional information on request or participate in any future discussions, both with Ofcom and any other stakeholder who has an interest in these bands.

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RSGB, Amsat-UK, UKuG & BATC, March 2007

Summary of Joint RSGB et al Position

IMT Candidate Band	Comment
410 to 430 MHz	No comment
450 to 470 MHz	No comment
470 to 862 MHz	See Response to Q2
2300 to 2400 MHz	See Response to Q5
2700 to 2900 MHz	See Response to Q4
3400 to 3600 MHz	See Response to Q3 regarding 3400-3410 MHz
3600 to 3800 MHz	No comment
3800 to 4200 MHz	No comment
4400 to 4990 MHz	No comment

Questions and Answers

Question 1:

Do you agree with Ofcom's analysis of the benefit of identifying spectrum for IMT at WRC-07 and the general consideration that needs to be addressed for each band?

Whilst it is useful to identify spectrum needs well in advance to enable long term planning, harmonised use and economies of scale, this needs to be done on a more consistent and equitable basis. Ofcom has not explained why IMT deserves such special treatment over existing services and users in these bands, who will have their own views and spectrum requirements.

Question 2:

Do you agree with Ofcom's proposal to seek a primary mobile service allocation in the band 470 to 862 MHz and a Resolution to initiate studies at WRC-07 for an IMT identification at WRC-11?

As it is not directly an Amateur band we are neutral in this regard. The Amateur Services do however have extensive experience in the EMC issues that are associated with terrestrial TV installations, many of which use broadband masthead amplifiers. We therefore suggest a cautious approach is taken, both to the technical studies and to the issue of Mobile vs Broadcast Service priorities, given the inevitable citizen consumer expectation of non-interference to TV reception (an expectation that may be strengthened after their investment in equipment as part of Digital Switchover)

Question 3:

Do you agree with Ofcom's proposal to support the development of a European Common Proposal for a co-primary allocation to the mobile (except aeronautical mobile) service and an identification for IMT in the band 3400 to 3800 MHz at WRC-07?

We note that this frequency range is the subject of ECC Report-100 (to which RSGB have successfully contributed) and draft decision ECC/DEC/(07)AA for BWA - in addition to it being a popular candidate for IMT, and having high value incumbent satellite services.

Cont'd/

Whilst we have no view at higher frequencies within this band, we do strongly object to the prospect of additional services that would not be compatible with weak signal flux operations by the Amateur Services in the 3400-3410 MHz section. This section is covered by CEPT Allocation footnote EU17¹ and is also allocated to the Amateur and Amateur Satellite Service in ITU Regions 2 & 3.

We advocate that any position that is adopted should account for incumbent users spectrum requirements. In this regard we highlight the stated IARU Spectrum Requirement to extend the 3400-3410MHz Amateur Satellite Service allocation to ITU Region-1, harmonising all three ITU regions.

We would highlight that if both the Amateur and Amateur Satellite Services were given globally harmonised protected allocations in this lower 10MHz range in the ITU Regulations, we would be prepared to consider greater sharing in the spectrum above 3410.

In the absence of the Amateur Services being granted Primary status in 3400-3410 we request a footnote for administrations to maintain this sub-band in such a way as to facilitate the reception of amateur emissions with minimal power flux densities. (in the spirit of, but more effective than EU17).

Question 4:

Do you agree with Ofcom's proposal to oppose any change to the allocations or an IMT identification in the band 2700 to 2900 MHz at WRC-07?

Given the widescale use of this band for safety-of-life aeronautical radar we support Ofcom's view that this band should not be changed, nor be identified for IMT. RSGB and its affiliates have a high regard for such safety-of-life bands.

Question 5:

Do you agree with Ofcom's proposal to adopt a neutral position on whether the remaining bands are supported or opposed as candidates for a mobile allocation and IMT identification?

In respect of the 2300-2400 band:

This band, as the consultation document correctly mentions, is extensively used by Amateur, Emergency, MoD PMSE and other services. In addition to amateur narrowband and beacon activity, the band is home to a substantial proportion of Amateur TV (inc. repeater) activity, a source of considerable innovation and self training.

We therefore find it strange that Ofcom then takes a neutral position which in principle would enable the UK Interests to be overruled. We consequently request that Ofcom adopt a No-Change position rather than a neutral one.

RSGB, Amsat-UK, UKuG & BATC - March 2007

¹ **EU17:** In the sub-bands **3400 - 3410 MHz**, 5660 - 5670 MHz, 10.36 - 10.37 GHz and 10.45 - 10.46 GHz the amateur service operates on a secondary basis. **In making assignments to other services, CEPT administrations are requested wherever possible to maintain these sub-bands in such a way as to facilitate the reception of amateur emissions with minimal power flux densities.**