

**Cover sheet for response to an Ofcom consultation**

**BASIC DETAILS**

**Consultation title:**                    **Wireless Telegraphy Licence Exemption**

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**Representing (organisation):**    **UK Microwave Group**

**Address (if not received by email):**

**CONFIDENTIALITY**

**What do you want Ofcom to keep confidential?**

Nothing                                                        Name/address/contact details/job title                   

Whole response                                                        Organisation                                   

Part of the response                                                        If there is no separate annex, which parts?

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes                                                        No                                   

**DECLARATION**

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom’s website, unless otherwise specified on this cover sheet, and I authorise Ofcom to make use of the information in this response to meet its legal requirements. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom can publish my response: on receipt                     once the consultation ends                   

Name       M.J.Niman                       Signed (if hard copy)

## Consultation Question and Answers

### Question 1:

*Do you agree with Ofcom's proposal to exempt users of Citizen's Band (CB) radio (and other related applications such as Community Audio Distribution) from the need to possess a Wireless Telegraphy Licence.:*

Agree but only if Ofcom thoroughly consider the following spectrum management issues:-

- a) Impact of the change in the solar sunspot cycle on propagation and degradation of service due to say Italian high power CB users
- b) Adjacent band protection for the amateur 10m band

### Question 2:

*Do you agree with Ofcom's proposals to permit the use of 'Micro' FM transmitters in the UK, and to authorise that use by licence exemption.:*

No comment

### Question 3:

*Do you agree with Ofcom's proposals to exempt users of High Density Fixed Satellite Services (HDFSS) terminals from the need to possess a Wireless Telegraphy Licence.:*

No comment

### Question 4:

*Do you agree with Ofcom's proposals to exempt users of Inmarsat GAN terminals from the need to possess a Wireless telegraphy Licence.:*

Yes

### Question 5:

*Do you agree with Ofcom's proposals to make available the frequency 24.05-24.25 GHz for use by short range radar (including automotive applications) devices on a licence-exempt basis.:*

### DEFINITELY NOT

This is completely against the spirit of the EC/CEPT package where 24GHz SRR was an interim measure only, pending greater use of the 79GHz band. Amateurs have Beacons etc licensed by Ofcom centred on 24.192 which would suffer and we would be pleased to have Ofcom re-license them to our Primary allocation at 24.048GHz

No consultation has occurred on the specification for these new radars which feature out of band emissions that spill below 24.05 into our Primary allocation and whose numbers would not be restricted

### Question 6:

*Do you agree with Ofcom's proposals to make available the band 2.4 GHz-2.4835 GHz for movement detection systems.:*

Only above 2402MHz to reduce impact on Amateur Satellite downlinks  
(We presume Ofcom has a typo re 2438 vs 2483)

**Question 7:**

*Do you with Ofcom's proposals to remove the need for users of most radar level gauge equipment to possess a Wireless Telegraphy Licence.:*

Only if they continue to be indoor or in-tank. (ie confined spaces).  
The rules should exclude open air installations

**Question 8:**

*Do you agree with Ofcom's proposals to exempt users Digital PMR 446 from the need to possess a Wireless telegraphy Licence:*

Yes, this new technology has great potential.  
In doing so please clarify the use of internet gateways and repeaters for 446 equipment

**Question 9:**

*Ofcom would welcome comments on it proposals to implements these changes concerning short range devices:*

Whilst some items are not a problem to us we have the following concerns:

The term 'wideband' is far too general for admin purposes and confuses with UWB etc. We prefer RLANS being continued for now

We do not support higher powers (ie anything above 100mW) in 2400-2450MHz to protect licensed services including Amateur Satellite downlinks and ATV receivers. The former are very weak flux and Ofcom is requested to support request for future moves of this particular allocation at a future WRC as its becoming unusable for ESA and the Amateur Satellite Service

We cannot support 76-77GHz changes until the implementation of EU35 is resolved as per the joint amateur submission to the 71-76/81-86GHz Links consultation and stricter controls on 76-77 OOB limits are reviewed as our view is that the current ETSI spec is too lax.

**Question 10:**

*Ofcom would welcome comments on it proposals to implement EC Decision 2005/928/:*

Agree

**Question 11:**

*Ofcom would welcome comments on it proposals to implement EC Decision 2005/513/:*

Yes, except for higher EIRPs

**Question 12:**

*Ofcom would welcome comments on any of the minor changes set out in this chapter and any other broader issues in relation to its approach to licence-exemption.:*

Please consider a wide exemption centred on the 60GHz oxygen absorption band

UK Microwave Group has contributed to Ofcom and EU studies on licence exemption in bands above 30GHz where we have a number of Primary allocations. Please clarify the timescales for reports / statements / consultations on this area