

UK MICROWAVE GROUP



Response to Ofcom Wireless Telegraphy Act Licence Fee Proposals for Encouraging Internet Licensing

16-May-2006

1. Who We Are

The UK Microwave Group (UKuG, www.microwavers.org) continues to celebrate its growth and success as the representative voice of amateur radio microwave enthusiasts in the UK. Our membership is growing both in the UK and across the World. The Group is affiliated to the Radio Society of Great Britain (RSGB) and, through the Group Committee, works closely with the RSGB Spectrum Forum. UKuG closely liaise with AMSAT-UK and BATC who are also users of UK Amateur Microwave allocations.

UK Microwave Group membership includes operators of Terrestrial, Amateur Satellite and Earth-Moon-Earth (EME) links, using a variety of leading edge weak signal receivers. Systems also include Microwave Propagation Beacons, Voice Repeaters and Fast-Scan Television Repeaters. Our membership base includes many people with professional backgrounds and extensive experience in science, engineering and communications.

In all amateur microwave allocations, our members and other Amateurs invest years of their own time and effort in the development and implementation high performance equipment. Since commercial 'black boxes' simply don't exist at our frequencies, amateur microwave activity is based on self-training and construction to the very highest standards. Results of these endeavours are made freely available to the wider engineering community. Our members are thus true to the requirement and spirit of the Radio Regulations and BR68 Paragraph 1(1), which refer to 'self-training'.

2. General Position

- We have observed and defended increasing encroachment of Amateur allocations, along with falling resources for spectrum/interference management. This makes us sceptical about the impact of reduced resources resulting from the move to free licences.
- Inputs have already received by Ofcom which show concern on Adobe-PDF based license certificates, and the lack of e-integration with the Exam system etc. Any new system should offer high integrity compatible with international reciprocal requirements.
- Ofcom is requested to maintain a licensing system that engenders value, integrity and a sympathetic attitude to the Amateur Services. At our frequencies in particular, a trained cadre of rf/microwave expertise is a scarce resource in the UK, an area which is our core constituency and which we are keen to foster.

3. Consultation Question and Answer

Question: *Do you agree that the simplification and removal of fees for amateur radio and ship radio licences issued via the internet will be beneficial to users of these classes and do you support the objectives for licence simplification?*

Fees and Certificates

We agree that the current paper based annual system is needlessly wasteful and could be simplified. UK Microwave Group (UKuG) itself is largely run on an electronic basis, yet many of our members do prefer and willingly pay the premium for printed hardcopies of our publications. There is also significant international collaboration amongst our membership so it is important that any new format licence certificates engender confidence in their integrity and be reciprocally recognised.

In the original Amateur Licensing consultation we detected little demand amongst our members for a free licence. In contrast many thought that this would devalue the status of the Amateur Services and undermine resources for issues related to interference, enforcement, spectrum usage rights and representation.

We are also disappointed that free licences will be withdrawn from certain postal applicants and urge Ofcom to reconsider retaining the current Under-21 and Over-75 exemptions.

Microwave Beacons and NoVs

Beacons are a key enabler in amateur microwaves, for both equipment test, as well as propagation measurements. At present Beacons are cleared free of charge, but this category is not explicitly referred to in Section 2.7 of the consultation document. UKuG is currently co-ordinating a roadmap for future 21st Century beacon developments. We would therefore welcome a clearer statement on Beacons and;

- Whether General Beacon Clearances will continue or whether they will be changed to personal NoVs
- Whether Ofcom would prefer fully electronic beacon applications (perhaps similar to Repeater e1.xls)
- How a more robust process can be put in place for coordination and tracing the progress of applications and engaging with other spectrum users with whom they might share.

UKuG would welcome discussions on the above in order to smooth the path for beacon applications.

IR2028 and EU35

We note the recent release of an updated IR-2028 that, come 2007, will remove a number of amateur microwave bands. We take this opportunity to remind Ofcom of their pledge in 2005 to implement EU35 for the retention of the 75.5-76GHz Amateur band on a Primary basis in time for the end of this year.

UK Microwave Group, May 2006
www.microwavers.org