

## Your response

Question	Your response
<p><b>Question 1: Do you agree with the prioritisation of the agenda items, as shown in Annex 5, and if not why?</b></p>	<p>No. I would prefer the UK priority for Agenda Items 1.1 and 9.1.6 to be raised. (See answers to Q23 and Q28.)</p>
<p><b>Question 2: Ofcom is supporting the following three priority bands for IMT identification in the RRs:</b></p> <ul style="list-style-type: none"> <li>24.25 – 27.5 GHz</li> <li>40.5-43.5 GHz (as part of a wider global 37-43.5 GHz tuning range)</li> <li>66 – 71 GHz</li> </ul> <p>If you don't agree with any of these bands, or think we should be promoting other bands, please provide justification for your views.</p>	<p>no opinion</p>
<p><b>Question 3: What are your views on the suitability of the currently identified bands for HAPs and do you think there is a requirement for additional spectrum? Recognising that we support 26 GHz as a global band for IMT under agenda item 1.13, what are your views on the bands currently under study for HAPs, both globally and in ITU-R Regions?</b></p>	<p>no opinion</p>

**Question 4: What are your views on the bands within scope of Agenda Item 1.16 and their suitability for Wi-Fi and Wi-Fi like services? Do you agree that Ofcom should support the CEPT position of No Change? If not, please provide evidence to support your view.**

no opinion

**Question 5: Do you agree that UK support the inclusion of the updated Recommendation M.1849-1 (“Technical and operational aspects of ground-based meteorological radars”) in footnote No.5450A? What are your views on the requirement to include a reference to ITU-R Recommendation ITU R M.1638 1 in footnotes No.5447A and 5.450A and the potential impact upon Wi-Fi (and similar technologies)?**

no opinion

**Question 6: Do you agree that UK support a position of not making changes to the Radio Regulations to reference specific bands for M2M/IoT usage?**

no opinion

**Question 7: What are your views on the potential removal of the limitations listed above?**

no opinion

<b>Question 8: What are your views on the approach we are proposing to take in respect of ESIMs and are there any additional factors that you think we should take into account?</b>	no opinion
<b>Question 9: What are your views on the establishment of regulatory provisions, in Article 22, that cover non-GSO operation between 37.5 and 51.4 GHz?</b>	no opinion
<b>Question 10: What are your views on the various issues under consideration under Agenda Item 7, particularly in respect of the bringing into use of non-geostationary satellite networks (i.e. Issue A)?</b>	no opinion
<b>Question 11: What are your views on Agenda Item 9.1.1?</b>	no opinion
<b>Question 12: What are your views on the potential establishment of satellite pfd limits, in the 1 452 – 1 492 MHz band, to protect terrestrial use?</b>	no opinion

<b>Question 13: Do you have any views on the bands being studied and are there any other considerations which you think should be taken into account? What are your views on the appropriateness of the current emission limits in the band 3 700 – 4 200 MHz?</b>	no opinion
<b>Question 14: Do you agree that no changes to the RRs are required, under Agenda Item 9.1.7, and that managing the unauthorised operation of earth station terminals (deployed within its territory) should be addressed by the national administration concerned?</b>	no opinion
<b>Question 15: What are your views on the need for additional fixed satellite service allocations in the band 51.4 – 52.4 GHz?</b>	no opinion
<b>Question 16: What are your views on Agenda Item 1.8, particularly the need to enhance maritime safety, set against the need to respect the international spectrum allocations and the protection of passive services in adjacent bands?</b>	no opinion
<b>Question 17: What are your views on Agenda Item 1.9.1, particularly the need to respect the current integrity of the AIS?</b>	no opinion

<b>Question 18: What are your views on Agenda Item 1.9.2, particularly the need to take into account current national users in the bands defined by RR Appendix 18?</b>	no opinion
<b>Question 19: What are your views on Agenda Item 1.10 and do you think that any changes to the Radio Regulations may be necessary?</b>	no opinion
<b>Question 20: What are your views on Agenda Item 1.11, and do you agree that no specific identification for rail communications is required in the Radio Regulations?</b>	no opinion
<b>Question 21: What are your views on Agenda Item 1.12 and do you agree that there is no requirement for specific identification to ITS in the Radio Regulations?</b>	no opinion
<b>Question 22: What are your views on Agenda Item 9.1.4 concerning radiocommunications for sub-orbital vehicles?</b>	no opinion

**Question 23: What are your views on Agenda Item 1.1, recognising that licensed amateur operators in the UK already have access to parts of the 50 – 54 MHz band?**

Amateurs in the UK regularly use this band to communicate worldwide. Therefore it is important that their peers in other countries have access to the same spectrum.

Following the end of TV broadcasting in Band I, some administrations could easily accommodate amateurs in this band but are reluctant to make an allocation using Article 4.4.

An allocation in the main table in Article 5 would result in amateurs in more R1 countries being able to use the band, just as was the case with the band 5351.5-5366.5 kHz following the allocation at WRC-15.

This band is subject to many forms of anomalous propagation, most notably sporadic-E. Amateur observations are still contributing to scientific research in this field.

There is at present no worldwide amateur allocation between 29.7 and 144 MHz. The ratio between these two (4.848) is a particularly large one.

Ofcom should raise the priority of this item and support the proposal.

**Question 24: What are your views on Agenda Item 1.2 concerning power limits for MetSat, Mobile Satellite and EESS, and the linkage to agenda item 1.7?**

no opinion

**Question 25: What are your views on Agenda Item 1.3, particularly on any limits required to protect terrestrial use?**

no opinion

**Question 26: What are your views on Agenda Item 1.7 considering spectrum needs for short duration satellites, noting also the potential linkages to Agenda Item 1.2?**

no opinion

**Question 27: What are your views on Agenda Item 1.15, particularly on the protection needs of passive services?**

no opinion

**Question 28: What are your views on Agenda Item 9.1.6, particularly on the categorisation of WPT and whether WRC action is required?**

WPT has the potential to create a lot of interference because of the high powers involved and the likely operation of millions of WPT devices in residential areas simultaneously. Even if the induction sources are free of harmonics, there is a huge potential problem with passive generation of harmonics by eddy currents induced into any corroded, non-linear metallic object in the vicinity - including vehicles, utility pipes and cables and street furniture. This might be just about tolerable if all such devices (in relation to the 79-90 kHz proposal) use a single tightly-controlled spot frequency of  $90 \text{ kHz} \pm 0.5 \text{ Hz}$ . (These parameters would provide the best protection for MF broadcast services in both 9 kHz and 10 kHz regions. Most LF/MF broadcast receivers use ferrite rod antennas which receive the magnetic component of the EM field.) The damage to reception of other radio services on LF, MF and HF is potentially devastating. This development needs watching very carefully and the UK's priority should be raised from medium to high.

**Question 29: Do you have any comments concerning the Standing Agenda Items, where not covered elsewhere in this document?**

Footnote 5.96 places a power restriction on amateur operation in the band 1850-2000 kHz. Are the services that this restriction aims to protect still in use? Loran-A is long gone (except possibly in China) and most if not all of the MF radiolocation systems once used for offshore surveying were replaced by GPS/DGPS-based systems over 20 years ago.

If China is no longer using Loran-A, then footnote 5.97 could be deleted.



<b>Question 30: Are you aware of any specific issues, not covered elsewhere in this document, which are likely to be raised in this part of the Director's Report and of which you think Ofcom should be aware?</b>	no opinion
<b>Question 31: Do you have any comments on Agenda Item 9.3 considering Resolution 80?</b>	no opinion
<b>Question 32: What changes to the Radio Regulations have you identified that would benefit from action at a WRC and why? Do you have any proposals regarding UK positions for future WRC agenda items or suggestions for other agenda items, needing changes to the Radio Regulations, that you would wish to see addressed by a future WRC?</b>	<p>I would like to see the following improvements to amateur HF allocations, which may now be feasible because of the considerable reduction in Broadcast and Fixed services use in recent decades.</p> <p>7 MHz - extended to 7.3 MHz 10 MHz - extended to 10.5 MHz 14 MHz - extended to 14.4 MHz</p>