

Your response

Question	Your response
Question 1: Do you agree with the prioritisation of the agenda items, as shown in Annex 5, and if not why?	No comment

Question 2: Ofcom is supporting the following three priority bands for IMT identification in the RRs:

24.25 – 27.5 GHz

40.5-43.5 GHz (as part of a wider global 37-43.5 GHz tuning range)

66 – 71 GHz

If you don't agree with any of these bands, or think we should be promoting other bands, please provide justification for your views.

Confidential? – N

Whilst the UKuG supports the IARU position that any IMT identification in the frequency range 24.25-27.5 GHz shall include full consideration and protection for the amateur and amateur-satellite service's primary allocation at 24-24.05 GHz.

The amateur and amateur-satellite services have a global primary allocation in 24 – 24.05 GHz and we are concerned that out of band emissions from a mass deployment of mobile broadband systems operating in very wide channels in adjacent frequencies may cause interfering noise in the primary amateur allocation, which includes several very weak signal frequencies.

Intercontinental communications, using the moon as a passive reflector, regularly takes place in this frequency range.

Transcontinental 24GHz band communications has been shown to work between the UK and continental Europe when professional propagation studies suggest that it is not possible. Signals are usually weak but the new digital modes show great promise in not only extending the achievable range, but also exploiting the observed dispersion to advantage using wideband digital modulation techniques that the new software defined radio/transceivers will permit.

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?

Confidential? – N

The UKuG would not wish to see adjacent out-of-band emissions causing interference to our primary amateur and amateur-satellite service allocations at 24.0-24.05 and 47.0-47.2 GHz.

Many of the 24 GHz frequency techniques developed by radio amateurs are now being extended to the amateur 47 GHz allocation and showing great promise.

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.

Confidential? – N

The UKuG is concerned that very weak amateur radio operation in the 5760 MHz frequency range be protected as this is now the only remaining frequency allocation between 1300 MHz and 25048 MHz that is globally common and facilitates intercontinental communications via moon reflection. Weak signal terrestrial communications across Europe will similarly be affected by a wider introduction of WiFi across this frequency range. The UKuG responded fully on this question in the 2017 OFCOM 'Response to the 5.8GHz BFWA consultation'.

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 comment

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 comment
Question 7: What are your views on the potential removal of the limitations listed above?	No comment
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?	No comment
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?	No comment
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)?	No comment

Question 11: What are your views on Agenda Item 9.1.1?	No comment
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?	No comment
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?	No comment
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?	No comment
Question 15: What are your views on the need for additional fixed satellite service allocations in the band 51.4 – 52.4 GHz?	No comment

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?	No comment
Question 17: What are your views on Agenda Item 1.9.1, particularly the need to respect the current integrity of the AIS?	No comment
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?	No comment
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?	No comment
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?	No comment

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?	No comment
Question 22: What are your views on Agenda Item 9.1.4 concerning radiocommunications for sub-orbital vehicles?	No comment
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?	No comment
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 comment
Question 25: What are your views on Agenda Item 1.3, particularly on any limits required to protect terrestrial use?	No comment

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 comment

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

Confidential? – N

The UKuG is encouraging the use of amateur radio service allocations above 100GHz. Currently UK radio amateurs are making contacts on 122, 134 and 241 GHz and are keen to extend operation above these allocations.

Radio amateurs are recognised for their resourcefulness in developing equipment and techniques for utilising frequencies beyond what would normally be expected to be useful for plain old communications (POC). Amateur radio access to these frequencies should not be hindered by unwarranted concerns for interference to passive services.

The full exploration of propagation at these frequencies can only be achieved by both the transmission and reception of signals; provided due care is taken to avoid unwanted interference to passive radio systems.

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

No comment

<p>Question 29: Do you have any comments concerning the Standing Agenda Items, where not covered elsewhere in this document?</p>	<p>No comment</p>
<p>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?</p>	<p>No comment</p>
<p>Question 31: Do you have any comments on Agenda Item 9.3 considering Resolution 80?</p>	<p>No comment</p>
<p>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?</p>	<p>No comment</p>

The UK Microwave Group is a specialist group, with elected Committee, representing the interests of UK microwave radio amateurs. It is affiliated to the Radio Society of Great Britain (RSGB).

With a membership of around 500, the Group's members are very active in various aspects of amateur microwave radio, including terrestrial, moon-bounce (EME), amateur TV, satellite and data transmission.

Technical matters and designs as well as operational techniques are regularly published in Scatterpoint, the newsletter of the UK Microwave Group. Many professional radio and

microwave engineers and managers contribute to the group and are known to read, and favourably comment on, the content of the newsletter.

The UK Microwave Group works closely with the British Amateur TV Club and AMSAT UK.