

Response from the UK Six Metre Group



Background

The UK Six Metre Group was founded in 1982 and played a major part in the initial opening up of the band in the UK. UKSMG is now the leading specialist group in the world dedicated to 50MHz, with 600 members in the UK and overseas; for more information see www.uksmg.org. Although we have been in regular discussions with RSGB on this issue, we also wish to make our own responses to the questions which relate directly to our sphere of interest, specifically Questions 1 and 23.

Responses to consultation questions

Question 1: Do you agree with the prioritisation of the agenda items, as shown in Annex 5, and if not why?

UKSMG does **not** agree with the proposed prioritisation of agenda item 1.1. The UK was the first large administration in Region 1 to release the 50MHz band to radio amateurs and we believe that it should be continuing to play a leadership role now.

Agenda item 1.1 is rated as 'Low priority', and you state that 'Low priority' means either: "sufficiently straightforward and uncontroversial that we can expect others to lead" or "relatively unimportant for the UK".

From the point of view of the UK 50MHz community neither of those expectations is correct. Ofcom's comment in section 7.3 states: "*Those countries in Region 1 who do not permit national access to the band would appear to have greater interest in this item*". We are very concerned that seems to be establishing a bias right from the start and to be accepting that those administrations which are not willing to support the proposal will win the argument by default.

UK amateurs do not operate in isolation and the consolidation and expansion of 50MHz across Region 1 is very important to us. Access across Region 1 is currently (a) partial, (b) insecure and (c) disparate. None of this supports the development of amateur radio practice in this fascinating part of the radio spectrum.

While we recognise that Ofcom is subject to resource limitations, we do believe that the UK should, as a minimum, **proactively and publicly express support for Agenda Item 1.1**. In



addition Ofcom should fully support the volunteer members of the UK delegation in promoting the adoption of a consolidated **common 50MHz frequency table globally**.

Without the UK's voice on this issue we would be missing a key supporter: one with an outstanding track record in promoting amateur radio development.



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?

Following the lead of the UK in the 1980s*, 50MHz activity in Europe has since then grown dramatically and this has now stimulated further activity on a global basis, with the UK still a major focus of activity. In the 1980s, 50MHz was a niche pursuit but interest and activity has now become 'mainstream' and a high proportion of radio amateurs now have equipment for the band. The large and active community of 50MHz enthusiasts is continually pushing the boundaries of communication, including in recent times the adoption of advanced data transmissions to track down and exploit the very brief but exciting opportunities to communicate across the world that are offered by radio propagation at low VHF. The very fact that such propagation conditions are fleeting is a magnet to amateurs and many two-way contacts have been made this year between the UK and North and South America, Africa and Asia over distances which in professional circles would not have been believed possible.

50MHz is now primarily an international band, both in the main sporadic-E season (May to August every year) and outside it. A large number of international two-way contacts are being made every year both within Europe and around the world. But unfortunately, while it is true that UK amateurs already have reasonably secure access to the 50 – 52MHz band, amateurs in many other countries are not in such a fortunate position; as has been referred to in our answer to Question 1, there is no formal 50MHz allocation in Region 1 and access to the band across the region is partial, insecure and disparate. Because of the high level of international working, common and coordinated frequency allocations are vital and UKSMG believes that this requires a **common global primary frequency table covering at least the range 50.000 – 50.500MHz**.

In addition, genuinely novel and innovative developments in the field of narrow band TV transmission and data modes are being held up by the lack of available space outside the parts of the band which are already used for long-distance narrow-band working and for simplex and repeater FM. Even narrow-band TV occupies a significant bandwidth and there are considerable concerns about interference to weak signal communications if this working is somehow 'squeezed into' the current spectrum allocation. **UKSMG therefore supports the proposal to extend the upper boundary of the band to 54MHz**, both in the UK and more widely, to facilitate experimentation and innovation.

Concerns may be expressed by some administrations about interference to other services in Band I, but the 50MHz range has been successfully shared by amateurs and other users ever since the earliest operations in the 1980s. We are not aware of a single instance of interference to other Band I services from amateur signals being reported over the last 35 years.

The only signals which are likely to be strong enough to cause such problems will either be from very local stations – an issue for individual national administrations – or perhaps from single-hop sporadic-E signals which intermittently (and in a highly localised way) propagate



over distances of 1000 - 2000km. But if there was such a problem, TV viewers in the Moscow and St Petersburg areas would have been reporting interference from amateurs in Western Europe for at least twenty years and they haven't. The various high-power 49.750MHz TV transmitters still operating across Russia have undoubtedly generated far more co-channel interference, both across their own country and in the rest of Europe, than amateur signals ever could.

Ever since the early days of the UK 50MHz allocation, research has always been a key part of the activities of UK radio amateurs. During the initial permit period a formal 50MHz research programme was established by the RSGB which gathered data from permit holders and produced reports on what was called 'The 50MHz Propagation Experiment'. Scientific research by amateurs continues to the present day, for example a recent investigation into the polarisation of sporadic-E signals using 50MHz amateur beacons as signal sources (www.youtube.com/watch?v=13Cs4nB1TjI) has now developed into a joint research project with the Department of Electronic and Electrical Engineering at Bath University.

In conclusion, the UK administration's position on Agenda Item 1.1 cannot and should not be determined purely on a narrow national basis. Innovation and experimentation by UK amateurs continues to grow but the continued health of these initiatives requires international coordination and a common allocation. We seek Ofcom's active support in attaining that goal.

* see <https://rsgb.org/main/operating/licensing-novs-visitors/uk-licensing/licensing-history/>

