

## 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>N</p> <p>The very rapid increase in the use by amateurs of new digital modes, such as the one known as FT8, which allows operation at very low signal to noise ratios (SNR), means that the 50MHz band may be found to support very long distance contacts under propagation conditions previously considered inimical for such communication. This can be expected to increase amateur activity, and provide new information on long distance propagation in this band. Because this means that some allocation at ITU level on a more formal basis than under RR4.4 would enhance useful research, the current Ofcom neutral position could usefully be expanded to give either a more positive approach or even a higher priority.</p>
<p><b>Question 2: Ofcom is supporting the following three priority bands for IMT identification in the RRs:</b></p> <p>24.25 – 27.5 GHz</p> <p>40.5-43.5 GHz (as part of a wider global 37-43.5 GHz tuning range)</p> <p>66 – 71 GHz</p> <p><b>If you don't agree with any of these bands, or think we should be promoting other bands, please provide justification for your views.</b></p>	<p>No comment</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 comment</p>
<p><b>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.</b></p>	<p>No comment</p>
<p><b>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)?</b></p>	<p>No comment</p>
<p><b>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?</b></p>	<p>No comment</p>
<p><b>Question 7: What are your views on the potential removal of the limitations listed above?</b></p>	<p>No comment</p>

<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 comment
<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 comment
<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 comment
<b>Question 11: What are your views on Agenda Item 9.1.1?</b>	No comment
<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 comment

<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 comment
<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 comment
<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 comment
<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 comment
<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 comment

<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 comment
<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 comment
<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 comment
<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 comment
<b>Question 22: What are your views on Agenda Item 9.1.4 concerning radiocommunications for sub-orbital vehicles?</b>	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?**

Confidential? – N

This Agenda item was supported by the CEPT when proposed at WRC15. Because there has never been a formal ITU R1 allocation, the result has been some restrictions, activity gaps caused by geographical variations in licencing and uncertainty in the long term. The band 47 – 68 MHz, officially allocated to Broadcasting in Region 1, has seen the actual use of the band for the allocated purpose significantly reduced. The Radio Regulations contain 6 footnotes regarding additional allocations for various services in this band.

VMARS proposes the UK support:

1) Although a primary allocation of 50 – 54MHz would achieve maximum harmonisation, it is recognised that even within the CEPT, this is probably impractical. However, a Primary segment of 50 – 50.5MHz, similar to the existing UK allocation, which covers the beacon and weak signal parts of the band – which could perhaps be shared if necessary in some countries – would provide greater stability in regard to regulatory developments.

2) A shared ITU allocation in the 50 - 52 MHz range. It should be noted that sharing in this range has existed in many countries between services in this band for many years.

3) A formal footnote permitting the use, shared on a non-interference basis where necessary, of the 52 – 54 MHz band by the amateur service. This would have advantages in providing bandwidth for more experimentation in advanced modulation techniques.

**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?**

No comment

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

N

This concerns Wireless Power Transfer for Electric Vehicle (WPT-EV) charging and is an area of grave concern not only for the amateur community, but also for many other users of the radio spectrum. VMARS agrees that WPT should not be regarded as ISM, but as a radio application, for which no new allocation is needed. The viability of determining frequency bands in the region of 20 and 79 - 90kHz which will not cause interference is a problem possibly requiring further study, especially in the area of 'Unwanted Emissions in the Spurious Domain'. Studies so far have shown that the levels contained in ITU-R Rec. SM329 are unlikely to be adequate to protect either the amateur, broadcast and even possibly certain Standard Time and Frequency services, while the CISPR levels offer even less protection.

This is an application aimed very much at a mass market, using significant power (3-10kW in the case of private cars), and even more in the case of charging for buses and Heavy Goods Vehicles (in this case up to 120kW) and thus will almost certainly have significant radiated (and probably conducted) power in terms of harmonics and wide band noise. These interfering emissions are likely to be of a high enough level to cover large geographical areas and frequency allocations, especially in view of the probable device density.

Standards are required to cover such areas as frequency stability, bandwidth (including the noise power), unwanted emissions and their field strength, compliance testing and so forth, and such firm technical proposals really need to be in place by the time of the WRC 19.



<p><b>Question 29: Do you have any comments concerning the Standing Agenda Items, where not covered elsewhere in this document?</b></p>	<p>N</p> <p>Regarding A.I.8 covering allocation footnotes, it is noted that some of the footnotes on allocations covering amateur bands and especially those regarding the range 1800 – 2000 kHz, would appear to be outdated. Although not applicable to the UK, it would be useful to support a review of these footnotes, some of which are considerably out of date.</p>
<p><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></p>	<p>No comment</p>
<p><b>Question 31: Do you have any comments on Agenda Item 9.3 considering Resolution 80?</b></p>	<p>No comment</p>
<p><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>	<p>No comment</p>