



Ofcom Consultation:

Enabling opportunities for innovation

Shared access to spectrum supporting mobile technology

Response by the Radio Society of Great Britain

March 2019

This response to the above Ofcom consultation is from the Radio Society of Great Britain (RSGB, www.rsgb.org) on behalf of its members and the wider Amateur Radio community in the UK. The latter includes both individual operators as well as a variety of special interest groups, including the UK Microwave Group (UKuG), AMSAT-UK and British Amateur Television Club (BATC) who have a particular interest in certain frequency ranges in this consultation.

The RSGB is recognised as one of the leading organisations in the world in the field of amateur radio. It collaborates with its fellow national societies via the International Amateur Radio Union (IARU) through IARU Region 1 (www.iaru-r1.org).

Amateur radio is a science-based technical hobby enjoyed by over three million people worldwide. From a statutory point of view, it is fully recognised by the International Telecommunication Union (ITU) as a Service and is listed in the ITU Radio Regulations as the Amateur Service and the Amateur Satellite Service.

The RSGB is commenting only on the proposals with respect to the 2300 MHz Shared Band.

RSGB Response to specific consultation questions:

Question 1: (Section 3)

Do you agree with our proposal for a single authorisation approach for new users to access the three shared access bands and that this will be coordinated by Ofcom and authorised through individual licensing on a per location, first come first served basis? Please give reasons supported by evidence for your views.

The RSGB is neutral on the proposals. The consultation document makes no mention of the licensed radio amateur allocation covering the “2300 MHz Shared Band” (2390 - 2400 MHz) which is included in the current UK amateur WT Act licence schedule.

In recent times, many pieces of amateur spectrum have been lost to commercial users and radio amateurs will not be happy to see new commercial operations moving into this band. These systems usually result in operational constraints for amateurs and degrade the noise environment for amateur small signal operations. However, the RSGB holds the view that the characteristics of amateur usage are unlikely to pose a threat to the potential commercial use cases described in the consultation document, although some commercial installations could disrupt amateur activities.

Therefore, the RSGB fully supports the position stated by Ofcom in the consultation document in Section 2.19 proposing no changes to incumbent users’ existing and future rights to deploy.

“2.19 By introducing additional users in the same spectrum as existing users, we are not proposing to change incumbent users’ existing and future rights to deploy. Incumbent users will continue to be able to deploy in accordance with their licence terms and conditions.”

Question 2: (Section 3)

Are there other potential uses in the three shared access bands that we have not identified?

Regarding the 2300 MHz Shared Band, Section 3.36 of the consultation document states that *“There are currently no licensed users at present.”*. The RSGB is surprised by this statement since the band is included in the UK amateur licence schedule and therefore could legitimately be used by any radio amateur in the UK.

Some typical amateur radio operations in the band include remote linking (data-links); digital amateur TV system reception; and Amateur Radio on the ISS (ARISS) connecting schools with the International Space Station.

The RSGB holds the view that the characteristics of amateur usage are unlikely to pose a threat to the potential commercial use cases described in the consultation document, although some commercial installations could disrupt amateur activities.