

Consultation response form

Your response

<p>Question 1: Do you agree with our assessment of current road tolling use in the 5.8 GHz band in the UK? Is there other current and future planned use that we are not aware of?</p>	<p>Confidential? – N No comment.</p>
<p>Question 2: Do you agree with our analysis of the options for managing sharing between BFWA and RTTT? Are there additional options which we have not considered which in your opinion would result in a better balance of benefits and risks?</p>	<p>Confidential? – N No comment.</p>
<p>Question 3: Do you agree with our proposal to remove the notch and allow BFWA use in the whole of the 5.8GHz band?</p>	<p>Confidential? – N</p> <p>No to allowing BFWA in the whole 5.8 GHz band especially above 5830 MHz.</p> <p>No view on the RTTT notch.</p> <p>The range 5830 – 5850 MHz is globally allocated to the amateur-satellite service in the table of frequency allocations in Article 5 of the ITU-R Radio Regulations (ITU-RR). This international sensitive service does not seem to have been considered in the consultation document.</p> <p>The amateur-satellite service can use this range in accordance with the IARU band plan for space to earth links in conjunction with uplinks in either the 5.6 GHz band (see ITU-RR footnote 5.282) or other amateur-</p>

satellite uplink bands.

Importantly for the amateur satellite service, this is the lowest frequency band above 1 GHz allocated to the amateur-satellite service in the ITU-R Radio Regulations albeit on a secondary basis. There is no ITU-R fixed service allocation in this range and it is only secondary in the European Common Allocation table (ECA).

Currently the 20 MHz 5.8 GHz BFWA channel centred on 5825 MHz is co-frequency with the lowest 5 MHz of the amateur-satellite allocation but 15 MHz of the allocation remains free from the potential for co-frequency BFWA operation.

In the European Table of Frequency Allocations (ERC Report 025), footnote ECA23 highlights the amateur-satellite service in the band 5830-5850 MHz (amongst others) and states that *"....In making assignments to other services, CEPT administrations are requested wherever possible to maintain these allocations in such a way as to facilitate the reception of amateur emissions with minimal power flux densities"*

No evidence can be found in the consultation that any consideration has been given to the request in this footnote.

The addition of new BFWA channels centred on 5825 MHz and 5835 MHz could interfere with the very low flux density signals that can be successfully received by amateur ground stations today.

Amateur-satellite downlink transmissions can be received by any amateur station in any location within the UK. The station might be operated by an individual or it might be part of a club or a group station which may be part of an international collaborative educational satellite system project.

One single interfering BFWA channel has the potential to block all reception of low flux density signals in the entire amateur-satellite segment as it can already in the parts of the band used for low flux density terrestrial reception in 5755 - 5765 MHz or 5820 – 5830 MHz. There is no option for the amateur station to change frequency within these sub-bands to escape the interference and maintain operation effectively reducing the amateur utility to zero.

The consultation does not indicate any compatibility studies carried out between BFWA operation and the amateur satellite service. It is stated that Ofcom “....does not expect the proposal presented here to

impact coexistence with these other uses.”
However no evidence to support this can be found in the consultation document.

Although the terrestrial amateur operations in 5755 - 5765 MHz have largely coexisted with the current BFWA operations and ISM applications, some amateurs have reported difficulties with sources of noise desensitising the band in certain locations from time to time.

One channel of 5.8 GHz BFWA operation can completely block the entire UK amateur terrestrial or satellite band and the only mitigation may be to move the BFWA operation to an alternative channel. However it may not be obvious to an amateur operator that BFWA operation is the source of interference and it is probably not obvious to a BFWA operator that they may be causing interference to amateur operations.

If the expectation is an increase in the deployment of BFWA links it is requested that Ofcom recognises the amateur and amateur-satellite service usage in the UK BFWA licensing guidance so that BFWA licence holders can be aware of the potential for sensitive amateur radio applications to be active in parts of the band. This could facilitate the possibility for

	dialogue between an affected amateur station and BFWA operator (if it can be determined that this is the source of the interference) which may result in request for the BFWA operator to use an alternative BFWA channel.
Question 4: Are there any other considerations that you believe need to be taken into account and that are not already covered in this consultation?	Confidential? – N No comment.