

## **Joint response from the Radio Society of Great Britain, UK Microwave Group, Amsat-UK and BATC.**

This response is a joint one to the above Ofcom consultation document from the Radio Society of Great Britain (RSGB, [www.rsgb.org.uk](http://www.rsgb.org.uk)) and its national affiliates who have microwave spectrum interests - Amsat-UK ([www.uk.amsat.org](http://www.uk.amsat.org)), UK Microwave Group (UKuG, [www.microwavers.org](http://www.microwavers.org)), and the British Amateur Television Club (BATC, [www.batc.org.uk](http://www.batc.org.uk)).

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](http://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 Amateur Services successfully share spectrum with Public Bodies. RSGB has also previously participated in the HM Treasury sponsored Independent Spectrum Audit process that preceded this consultation.

We would be pleased to provide any additional information on request or participate in any future discussions, both with Ofcom and any other stakeholder who has an interest in these bands.

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### **Consultation Question and Answer**

**In addition to the comments below we would like to draw Ofcom's attention to two previous RSGB submissions to the Independent Audit of Spectrum Holdings.**

**These are available online at: <http://www.spectrumaudit.org.uk/responses.htm>**

#### **Question**

***Do stakeholders agree with the proposed statutory instruments set out in this notice for the award of this spectrum?***

**Question 1:** *Do you agree with Ofcom's proposed overall approach to improving the management of public sector spectrum holdings and, in particular, with Ofcom's conclusion that it will generally be preferable for public sector bodies to interact directly with the market?*

We have significant concerns with this approach as it implies that Ofcom would withdraw from Spectrum management. At present RSGB look to Ofcom to facilitate discussions and clear NoVs in liaison with Primary Users, engage on International matters and generally manage Amateur Spectrum. Whilst we do occasionally engage with some Primary Users (and welcome opportunities for such contacts), we firmly believe and prefer that Ofcom will continue to have a key role to play. Most bands do

not have a single exclusive incumbent, but may already have several who share creating a more complex starting scenario. One factor that also concerns us is that it is far from certain that all Public Sector bodies will be able to expertly and consistently engage in such a 'Brave New World' of frequency trading and technical issues related to spectrum user rights.

**Question 2:** *What factors do you consider Ofcom should take into account in determining the programme of reform in the framework for managing public sector spectrum holdings?*

The range of bodies and factors is highly diverse and not necessarily suited to market mechanisms – see also our answers to Q1 above and Q7 below.

**Question 3:** *Do you consider that the proposals should be phased in?*

Absolutely! There is a clear need for further detail from Ofcom as well as the future Spectrum Demands from Public Bodies (such as MoD). Some form of pilot study is greatly preferred to any Big-Bang approach.

**Question 4:** *Do you agree with Ofcom's proposals about the frequency bands that offer the greatest potential benefits from band sharing? Are there other frequency bands where the facility to trade or lease spectrum from public sector bodies would be particularly attractive?*

We would like to highlight an omission in Table 6.2. There are significant Amateur TV Repeater and other interests in the 2.3 GHz band. Some of the other bands include or are adjacent to Amateur Services and we look forward to engaging with Ofcom via the established liaison forum mechanism.

**Question 5:** *Do you agree with Ofcom's proposed approach to awarding public sector licences and RSA?*

No comment

**Question 6:** *Should public sector spectrum trading be introduced at this stage in the Channel Islands and Isle of Man?*

Whilst this is a matter for Ofcom, we would appreciate a consistent regime across the UK as a long term aim

**Question 7:** *Should there be additional grounds, eg safety-related, for Ofcom to refuse consent to a proposed trade in certain frequency bands or for certain applications?*

We believe there are a number of grounds (in addition to commercial or competition issues) that should be considered. These include Safety related applications, provision for Emergency or Civil Contingency Comms, International Agreements, Incumbent Users, the Voluntary Sector and Social Value/Impact.