

**Question 1: Do stakeholders agree with the proposals for the award of licences in the 10 GHz, 28 GHz and 32 GHz bands in 2007?:** This vital Amateur Satellite allocation at 10Ghz was recently used by the AO-40 Satellite. Other Amateur satellites are currently under construction such as P3E and the Mars orbiter will be using that segment. I refer you to:-

<http://www.microwaves.org/files/10ghz-amateur-satellites.pdf>

Interference levels.

Ofcom envisage that the future commercial user would run up to 55dBW eirp in this band. Such transmissions would completely wipe out the weak signals received by amateurs.

It is not just the top half of the Satellite allocation that would be affected, as Ofcom propose the following protection for adjacent bands  
" $43+10\log_{10}(p)$  db or -70dbc, whichever is the less stringent for out of band emissions where P is the output power applied to the transmission line, -dBc refers to the level relative to the main carrier".

This is remarkably lax, for a 55dBw transmitter; out of band emissions which could fall in the lower half of the Satellite allocation 10.450- 10.457 Ghz, would be 15 dbm which is way above receiver noise floors. Amateurs operate narrowband with receivers as good as -130dBm.

Compare Ofcom's proposed protection levels with those specified by CEPT for Ultra Wide Band where -85dBm/Mhz is used as protection for valuable services.

**Question 2: Do stakeholders agree with the proposal to include in the award of the 32 GHz band that portion of the band that has been open since 2003 for point-to-point applications?:**

**Question 3: Do stakeholders agree with the proposals to defer the release of the 40 GHz band and review the position in two years? time?:**

**Question 4: Do stakeholders have any other comments on the contents of this document?:**

This is the top half of the internationally agreed Amateur Satellite Service 10Ghz allocation.

The claim in one place that 10.45-10.5 Ghz is designated as Space to Earth is incorrect, the allocation can be used for both Space to Earth and Earth to Space communications.

The proposed changes would mean that a Licensed Amateur operating within internationally agreed spectrum, could if the changes were enacted be shut down at the whim of a user who will not be required to keep his emissions to the same standard. I refer you to "Use by the Amateur Service on a national basis would only be permitted where the Amateur licensee could be confident of not causing interference to the spectrum access licensee"

Not only would such action contravene Internationally agreed spectrum use but it

would severely limit the development of SHF technology by amateurs, groups, schools and colleges in the pursuit of technical training and innovation or the education of potential future electronic engineers.

**Additional comments:** The signatories to the above are all members of the::

South Manchester Radio and Computer club.

R Scofield G3RJQ

C Muriel G3ZDM

R P Smith G3SVW RSGB EMC Coordinator

P N Davis

R Meyers G8LUL

J Neyman G8GAJ

L Levy G4DEE

G Whitney G8RSI

J Hutchins G6ISA

P Conneth

W Furness G8SMM

P Taylor G3YQD

D Bates G0LZL

P Fambely G0BHP