

# RADIO SOCIETY OF GREAT BRITAIN

## “OFCOM SPECTRUM FRAMEWORK REVIEW”

### ADVICE TO MEMBERS

The Radio Society of Great Britain (RSGB) has been asked by many members to provide guidance concerning the manner of response to SPECTRUM FRAMEWORK REVIEW, a document issued by Ofcom on how the radio spectrum should be managed.

The document contains 18 Consultation Questions, the answers to which will form the major part of any response. Additional information may be provided as part of a response and Ofcom claims that they will make things as easy as possible to include a written response but the answers to the questions will in all probability be the method most likely to command attention.

Some concerns have been expressed about the claim that ‘things will be as easy as possible’. Any member wishing to properly understand the document must first come to terms with a glossary of thirty words and expressions that have meanings sometimes devoid of either simple or plain English understandings. An example is the extent by which beauty contests can have a bearing on the management of the electro-magnetic spectrum. Amateurs have long been subject to requirements that forbid the use of secret codes and may find it difficult to suddenly contend with simple English words that have a meaning, fully understood only by a minority. Unfortunately, this long glossary only serves to make more difficult the advice RSGB can give to its members so that they can respond in an easy to understand fashion.

The Society cannot provide a ‘stock’ answer to each question because we are still researching some aspects of the document including the true meaning of expressions such as ‘a light touch regulator’ and ‘technology-neutral spectrum’. Nevertheless, we would remind members that all transmissions below 30 MHz constantly involve propagation that crosses international boundaries whilst all transmissions between 30MHz and 1GHz will be subject to sporadic propagation that crosses international boundaries.

With this in mind we have attempted to suggest some aspects of each question that may assist Amateurs in their responses.

Question 1:- Some members have been alarmed that a document that seeks consultation on how to decide how the spectrum should be managed apparently acknowledges that issues may not have been identified. How competent has the authors’ research been?

Question 2:- Previous annotated frequency tables have, amongst other things, given rise to the voluntary Band Plans adopted within the amateur community. We see no problems with a comprehensive frequency table.

Question 3:- The document acknowledges that discussion relating to specific services or bands will not fall within its pages. The question apparently concentrates on four issues, three of which have no obvious bearing on amateurs. However, the release of military bands may have benefit for all users, including amateurs.

Question 4:-The information given in Annex G has apparently been drawn from a 31 page background document that was one of two documents submitted for an ITU conference in February 2004, the full report of which has not yet been published. Without all relevant information it is difficult to comment.

Question 5 and Question 6:- The document acknowledges in Table 4,1 that there is an operational need for harmonisation on an international basis for amateur bands and that operation below 30MHz will also need international cooperation. There is some concern that sporadic long distance propagation has not been included as a comment in that table and that the table glosses over Amateur allocations in the GHz area. Accordingly these questions do not seem relevant to most amateur frequencies. However, concerns will exist in the GHz ranges and frequencies in those areas that have, by international agreement, been allocated on a primary basis to the Amateur and Amateur Satellite services should NOT be liberalised.

Question 7, Question 8 and Question 9:- We cannot support the release of any frequencies, allocated to amateurs, for licence-exempt use.

Question10:-Market based spectrum management will not be suitable for amateur radio.

Question11:-Research is still being conducted to see how use of, or the right to use, the electromagnetic spectrum by technology-neutral means can be achieved or even what it means.

Question12:-We would welcome proactive monitoring of interference but are concerned that reactive means which will only be activated after licence holders have failed to agree may have financial implications for weaker players.

Question13:-The promotion of innovation must be applied equally for all users of the spectrum especially in allowing 'innovative use' licences, or similar. We wonder how unbiased intermediaries, should they be used, will be identified.

Question14 and Question 15:-The conventional approach to harmonisation would be preferred by most amateurs. We are concerned that a previous liberalisation of interference standards, apparently to encourage technological developments that have not become commercially viable, has unnecessarily degraded all standards. We do not wish to see any further degradation of those interference standards.

Question 16:-Division by frequency seems to be the best option.

Question17:-This area is still being researched and no advice is given at this point.

Question18:- There exists an acknowledged failure to encourage young people to migrate from education to science based careers. Several areas of scientific endeavour including developments in communications are beginning to suffer from a lack of qualified engineers. The regulatory impact assessment E.3 fails to address this shortcoming and this may eventually harm competitiveness. A healthy and expanding amateur radio community contains a pool of skills able to contribute to addressing this area of risk.

RSGB encourages members to use their wide knowledge of spectrum matters supported by the advice given above to develop answers to each question. Annex C of the document shows how to complete a response cover sheet. Completed responses should, ideally, be E-mailed to the address on page 50 [william.webb@ofcom.org.uk](mailto:william.webb@ofcom.org.uk)  
Alternatively a response can be sent by post to Professor William Webb, Ofcom, Riverside House, 2a, Southwark Bridge Road, London, SE1 9HA.