

Spectrum management strategy – Ofcom’s approach to and priorities for spectrum management over the next ten years

Introduction

This response to the above Ofcom consultation document is from the Radio Society of Great Britain (RSGB, rsgb.org) on behalf of its members and the wider Amateur Radio community in the UK. 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. An overview of amateur radio is provided in section 13 of the Appendix to spectrum management strategy: future developments in major spectrum users. In addition to highlighting the regulatory aspects this overview also provides an indication of the wider benefit of amateur radio in terms of its impact on the UK’s engineering and science base.

From a statutory point of view amateur radio 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.

Permission is granted for a copy of this response to be placed in the public domain

Responses to the consultation questions

Question 1: Have we captured all the major trends that are likely to impact spectrum use over the next ten years in this section and the separate Appendix on sectoral developments? Are there other market, technology or international developments that could lead to significant changes in spectrum demand and supply over the next 10 years?

This section mentions the "interference environment". The RSGB considers that the growing use of non-radio communications electronic devices in both domestic and commercial environments is likely to impact on efficient use of the spectrum by causing interference in specific cases and through a more general cumulative effect on the noise floor. While formerly this mostly concerned lower frequencies, there are now indications that VHF and UHF spectrum will gradually be affected. Ofcom can tackle this through a combination of two mechanisms:

First, through more effective market surveillance of products to ensure they meet the EMC Directive’s Essential Requirements. This would help ensure a greater level of compliance of apparatus and installations when they are first placed on the market or otherwise first brought into service;

Second, the introduction of new, comprehensive interference Regulations under section 54 of the Wireless Telegraphy Act. These would cover instances of interference from apparatus and installations in continuing use, due for example to ageing or inadequate maintenance. Hence they operate independently and for a different purpose to the EMC Directive regime.

Question 2: Do you have any comments on this summary of our approach to spectrum management and on the principles discussed in Annex 5?

No comment

Question 3: Do you think we have adopted the right approach to analysing future trends and developments that could raise the need for future regulatory action?

No comment

Question 4: What are your views on the results of our analysis of future developments summarised in this section and discussed in greater detail in the Appendix to this consultation? Please provide evidence in support of your views wherever possible

No comment

Question 5: Do you agree that a consideration of mobile and wireless data demands should feature as a priority area in our work programme for the next ten years? Have we captured all the major issues that we should consider within this area?

No comment

Question 6: Do you agree that the future of PMSE spectrum access should feature as a priority area in our work programme for the next ten years? Have we captured all the major issues that we should consider within this area?

No comment

Question 7: Do you agree that the implementation of our 700 MHz strategy and the longer term future of DTT should feature as a priority area in our work programme for the next ten years? Have we captured all the major issues that we should consider within this area?

No comment

Question 8: Do you agree that a consideration of competing demands for spectrum at 450 - 470 MHz should feature as a priority area in our work programme for the next ten years? Have we captured all the major issues that we should consider within this area?

No comment

Question 9: Do you agree that spectrum sharing should feature as a priority area in our work programme for the next ten years? Have we captured all the major issues that we should consider within this area?

No comment

Question 10: Do you agree that, in future, we should consider whether and how to play a greater role in supporting improvements to the performance of RF transmitters and receivers? What are your views on the potential future role for regulation in this area?

Yes. Whilst your report highlights the work done in this respect by industry there is an important role for the regulator to ensure that unintended co-existence and adjacent management issues between services are addressed. There is a case for regulation of receiver performance. While receivers do not cause interference to other users, poor performance makes them self-victims and limits spectrum usage. We note that the proposed Radio Equipment Directive currently excludes stand alone receivers. We understand that BIS, with industry support, still favours inclusion and we add our support to that position.

Question 11: Are there other issues or potential future challenges that you consider should feature as a priority in our work programme for the next ten years? Please provide evidence in support of your views wherever possible

No comment

Question 12: Do you consider that tracking these metrics could be a useful way to help monitor the effects that our spectrum management strategy has on the nature of spectrum access and how this changes over time? Are there any other indicators that we should be seeking to track for these purposes?

No comment

Question 13: Do you consider that targeted spectrum utilisation measurements could be useful in informing future spectrum management initiatives? What type of specific uses or bands could be the subject of future measurement studies, and why? Please provide evidence in support of your views wherever possible

No comment