

John Hazell

Response to the notice of Ofcom's proposal to exempt automotive short-range radar users at 79 GHz from wireless telegraphy licensing.

Who I am

I am responding as a UK amateur radio licence holder and user of the current primary Amateur Radio allocation at 75.5-76 GHz

Concerns

The current frequency allocation 75.5-76 GHz ceases at the end of 2006 in the UK. RA Notice July 2003 (now Ofcom) asks the Amateur Service to move up to the 77-81 GHz band by the end of 2006 the frequencies now proposed for licence free SRR.

My particular concern is the safety issues with amateur service transmissions in the same (77-81 GHz) frequency allocation as SRR. There is a belief that Amateurs operate from mountain tops and remote elevated locations at these frequencies. This is not always the case. Access to the countryside with technical equipment is now severely restricted and seldom granted by the Countryside Authorities even by special application. Much communication and experimentation is therefore done from suitable roadside locations because of the access restrictions to open countryside. The nature of the frequency is such that antenna gains are seldom less than 40db and it is quite likely that the main transmission radiation lobe could easily be directed near the highway. This I see as a particular and important safety issue to the users of SRR. Secondly there is also the received interference aspect affecting low signal level reception to the amateur service from these SRR transmissions.

Considering

The Electronic Communications Committee (ECC) report No. 56 within the European Conference of Postal and Telecommunications Administrations (CEPT) states on page 8. in footnote **EU35**

*The band 75.5-76 GHz is in Europe also allocated to the Amateur and Amateur Satellite services **after year 2006.***

Interim SRR

I am also most concerned that the amateur Primary allocation 24-24.05 GHz also appears to be under threat from SRR. I am not aware of any consultation or compatibility studies to amateur communications for these frequencies. The adjacent 23.6-24 GHz Primary exclusive and passive for scientific and environmental use must also be under threat from SRR.

Conclusions:

I would strongly urge that Ofcom implement a continued allocation 75.5-76GHz to the UK Amateurs radio service post 2006 in line with the European

allocation footnote EU35. This will provide both European frequency allocation conformity and remove possible safety issues between amateur services and SRR.

It should also be made clear to SRR vendors that in sharing frequencies they do so on a non protected basis.

Ideally if Ofcom can implement Footnote EU35 into the UK allocation Tables and Schedule for UK Radio Amateurs and restrain from allocating 24 GHz SRR in our primary allocation then the interference will be minimised and 79 GHz SRR will be developed faster fostering millimetric technological development.