

**Spectrum Framework Review**  
**Consultation questions**

**Q1:** Are there any other major medium- to long-term spectrum management issues that this review should be considering? Are there any other significant technological or market developments that this review should be aware of when developing its thinking?

Yes, PLC is a poor technological solution, almost guaranteed to cause interference in that part of the spectrum where weak signals are routinely received for international communications. Ofcom should move to support broadband wireless Internet access instead.

**Q2:** Do you believe it is useful to publish a compendium of issues?

Yes

How frequently should it be published?

Annually, with supplements as changes are made

What information should be included?

As much as possible

**Q3:** Are there any other issues of sufficient significance to merit mention in this document?

See Q1

**Q4:** Are there important lessons to be learnt from experience in other countries that is not addressed here?

Deregulation of electric power in California has led directly to a power crisis, suggesting that market mechanisms may sometimes backfire in a spectacular way. The outcome in that specific case is not "better than would likely have been achieved" by command and control.

**Q5:** Do you agree with Ofcom's intent to maximise the use of trading and liberalisation?

Not really. I see a need to tread very carefully to avoid serious problems. Some liberalisation is a good thing, if taken slowly, and some trading is inevitable in areas such as mobile phones, but this should not be taken too far.

**Q6:** Are there other areas, apart from those identified above, where trading and liberalisation should be restricted?

No, the list seems to be adequate.

Are there areas identified above where you believe the trading and liberalisation could be fully implemented?

No, definitely not. There are sound reasons why these services and the spectrum below 30 Mhz need to be protected.

**Q7:** Do you agree with Ofcom's approach to providing spectrum for licence-exempt use?

In part.

However, making amateur radio a licence exempt service would raise serious international issues. The UK is a signatory to a CEPT agreement (which in practice also includes many non-CEPT countries) to

provide reciprocal licensing between various countries. In addition, each country has their own requirements for operation by visiting and/or foreign radio amateurs, the one common element of which is that the visiting radio amateur must have a licence from another jurisdiction before they are allowed to operate. With the prevalence of international travel, it is vital to continue such arrangements, besides the issue of treaty obligations.

In addition, ITU regulations now provide a syllabus for testing radio amateurs to verify competency, as has been done in the UK for many years in any case by way of the existing examinations.

Replacing licensing per se with mere possession of a pass certificate would not enable a licence exempt service, as amateur radio is one of the services specifically identified by ITU regulations where stations must be identified by unique international callsigns, and so some mechanism for allocating an international callsign to each radio amateur must necessarily continue to exist.

The reason that this requirement exists is, of course, that amateur radio signals routinely cross borders. This is not restricted to signals below 30 Mhz, but also much higher in frequency during tropospheric disturbances.

Given the necessity of continuing to both administer examinations and issue callsigns in accordance with ITU regulations, it is hard to conceive of any viable system for amateur radio that would not look like a licensing scheme.

**Q8:** Is Ofcom's proposed methodology to estimate the amount of spectrum provided for licence-exempt use likely to deliver the right results?

Not sure.

**Q9:** What is the appropriate timing and frequency bands for making available any additional spectrum needed for licence-exempt use?

International harmonisation should be looked at carefully, for example to allow portable communications devices and laptop computers to be used freely across borders.

**Q10:** Do you agree with Ofcom's longer term proposals for spectrum trading?

I don't feel that they go into enough detail to decide.

**Q11:** Is the approach set out here, and in Annex H, for developing technology-neutral spectrum usage rights appropriate? Are there alternatives?

Probably OK for new services. Less enthusiastic in the case of existing services.

**Q12:** Should Ofcom do more to resolve interference?

Present levels of enforcement seem satisfactory

**Q13:** To what extent should Ofcom intervene in promoting innovation?

The approach suggested seems to be OK

**Q14:** Do you agree with Ofcom's proposed approach to harmonisation?

Not entirely. I would place more emphasis on harmonisation, as the lack thereof places a restraint on usage of devices across borders.

**Q15:** Can you foresee any problems with the proposed approach to harmonisation other than those listed above?

No

**Q16:** Do you agree with Ofcom's proposal to continue with division by frequency as the primary method of dividing the spectrum?

Yes. Wideband signals need to be contained within specific frequency bands, otherwise a detrimental increase in the noise floor will adversely affect other users, particularly analogue users, which will continue to be important for the foreseeable future. In particular, wideband signals below 30 Mhz, such as PLC, should not be permitted.

**Q17:** Is Ofcom's approach of not Intervening to mandate entitlements in time appropriate?

Yes. Havoc might well otherwise result.

**Q18:** Do you agree with the RIA?

Don't understand the acronym.