

**Applying spectrum pricing to the
Maritime and Aeronautical sectors**
Consultation Document

**Joint response from the Radio Society of Great Britain,
UK Microwave Group, Amsat-UK and BATC.**

October 30th 2008



Introduction

This response is a joint one to the above Ofcom consultation document from the Radio Society of Great Britain (RSGB, www.rsgb.org.uk) and its national affiliates who have microwave spectrum interests - Amsat-UK (www.uk.amsat.org), UK Microwave Group (UKuG, www.microwavers.org), and the British Amateur Television Club (BATC, www.batc.org.uk).

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 that contributes to education, innovation, skills and emergency communications. It is enjoyed by over three million people worldwide. From a statutory point of view it 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.

The Amateur Services successfully share spectrum with Public Bodies including MoD and CAA, including the L-Band Band radar spectrum that is the topic of this consultation. We are keen that this relationship continues and the investments and innovations by the 60,000+ licensees are safeguarded.

RSGB has previously participated in the HM Treasury sponsored Independent Spectrum Audit process (aka the 'Cave Audit') and the Ofcom Public Sector Framework Review that preceded this consultation, and has recently responded to a related consultation by MoD on Defence Spectrum Management.

We would be pleased to provide any additional information on request or participate in any future discussions, both with Ofcom and any other Primary User or stakeholder who has an interest.

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RSGB, Amsat-Uk, UKuG & BATC, October 2008

General Position

This entire scheme raises very complex issues which we feel need more than one 'arms-length' round of consultation. Closer liaison with existing secondary users would be particularly appreciated

Consultation Questions & Answers

Section-2 – Introduction and background

Question 1: *How should Ofcom manage the process of taking advice from users, regulators and government on efficient apportionment of AIP fees in the maritime and aeronautical sectors? Are any new institutional arrangements needed?*

Referring to Para-2.8, for many years the Amateur and Amateur Satellite Services have successfully shared spectrum on a Secondary basis in L-Band Radiolocation spectrum (1240-1315MHz), facilitated by Ofcom et al. We continue to pay particular respect to Primary User interests as we recognise this spectrum has 'safety-of-life' air traffic management.

Whilst not subject to AIP ourselves, we are concerned on its potential impact in this band and changes it may cause to existing sharing criteria and frequency assignments. We look forward to Ofcom and/or Primary User proposals regarding future, preferably transparent, coordination arrangements for managing this process.

We also note that parts of L-Band are also allocated to GNSS (Galileo) on a Primary basis which may not be subject to the same AIP mechanism and invite Ofcom to comment on its position regarding this.

Section-3 – Ofcom's objectives and approach in applying AIP

Question 2: *If you consider that our proposals for pricing ground station users for any spectrum would be likely to have a detrimental impact on safety, please let us know. In order for us to understand your assessment fully, it would be helpful if you could outline the mechanisms whereby this might happen.*

It is important that any top-level pricing mechanism/rate does not create an inadvertent distortion in practice that might ultimately be counter to Ofcom's priorities.

This comment in particular refers to the very different nature of the radars, applications and sharing in L-Band vs S-Band. L-Band has relatively fewer, but longer range radars, compared to the higher number of shorter range systems in S-Band (where we are aware Ofcom has a greater interest in sharing for potential mobile use). If flowdown were to occur this might significantly reduce the 'per-radar' incentive in S-band relative to L-Band.

Question 3, 4: - no comment

Section-4 – Initial pricing proposals

Question 5: - no comment

Question 6: *Do you consider that we should discount fees for any particular user or type of user? Specifically, do you consider that there should be a discount for charities whose object is the safety of human life in an emergency?*

Both charities eg (RNLI etc) and amateurs (RAYNET etc) provide such voluntary services and it is entirely reasonable that special treatment should be available for them

Fees proposed for VHF comms in 2009 (Phase-1)

Question 7, 8, 9: - *no comment*

Fees proposed for radars etc during 2010 (Phase-2)

Question 10: *Ofcom would welcome stakeholders' views on the factors which should be taken into account when apportioning fees between individual users of radars and racons.*

and

Question 11: *Do you agree with our initial view that a reference rate of £126k per 1MHz of national spectrum for L band and S band radar spectrum would achieve an appropriate balance between providing incentives to ensure efficient use of spectrum while guarding against the risks of regulatory failure in setting the reference rate too high?*

If you consider a different rate would be more appropriate, please provide any evidence that you think we should take into account.

[See our reply to Q2.](#)

Question 12, 13, 14: - *no comment*