CEPT DRAFT ECC REPORT 100 ON COMPATIBILITY STUDIES IN THE BAND 3400-3800MHz BETWEEN BROADBAND WIRELESS SYSTEMS AND OTHER SYSTEMS AND SERVICES

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

Introduction

This response is a joint one from the Radio Society of Great Britain (RSGB, www.rsgb.org.uk) and its affiliates UK Microwave Group (UKuG, www.microwavers.org) and Amsat-UK (www.uk.amsat.org).

Comments

We would like to comment on Section-II (page-6) of the draft report and its reference to the Amateur Service.

> *The band 3400-3475 MHz is also allocated on a secondary basis to the Radio Amateur service in two CEPT countries through RR No. 5.431. Due to the limited use and the status of the allocation to the amateur service, no compatibility study was felt necessary.*

The implication of the above is that a total of only two countries in CEPT have 3400MHz band allocations. This is inaccurate and potentially misleading.

In fact three CEPT countries (UK, Germany and Bulgaria) have substantial allocations in the 3400-3500MHz band and a significant number of other CEPT states have allocations in the 3400-3410MHz band (aligned with ECA Footnote EU17). This data is available in published national allocation tables.

Current Amateur Service allocations are tabulated in Figure-1 and illustrated in Figure-2. The principal centre of activity is by narrowband communications modes in the 3400-3410 segment, complemented by a significant number of Propagation beacons as detailed in Annex-1.

Regulatory Consideration

EU17: In the sub-bands **3400-3410MHz**, 5660-5670MHz, 10.36-10.37GHz, 10.45-10.46GHz the Amateur Service operates on a secondary basis. **In making assignments to other services, CEPT administrations are requested wherever possible to maintain these sub-bands in such a way as to facilitate the reception of amateur emissions with minimal power flux densities.**

Requests

1) That the paragraph referring to the Amateur Service in Section-II is amended to clarify usage/allocations

2) That in line with this usage and the guidance in EU17 – a compatibility study for the Amateur Service is included in Report 100, particularly for the 3400-3410MHz band.

We thank CEPT for this opportunity to comment. We would be pleased to provide additional information on request or participate in any future discussions.

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RSGB, UKuG & Amsat-UK, December 2006

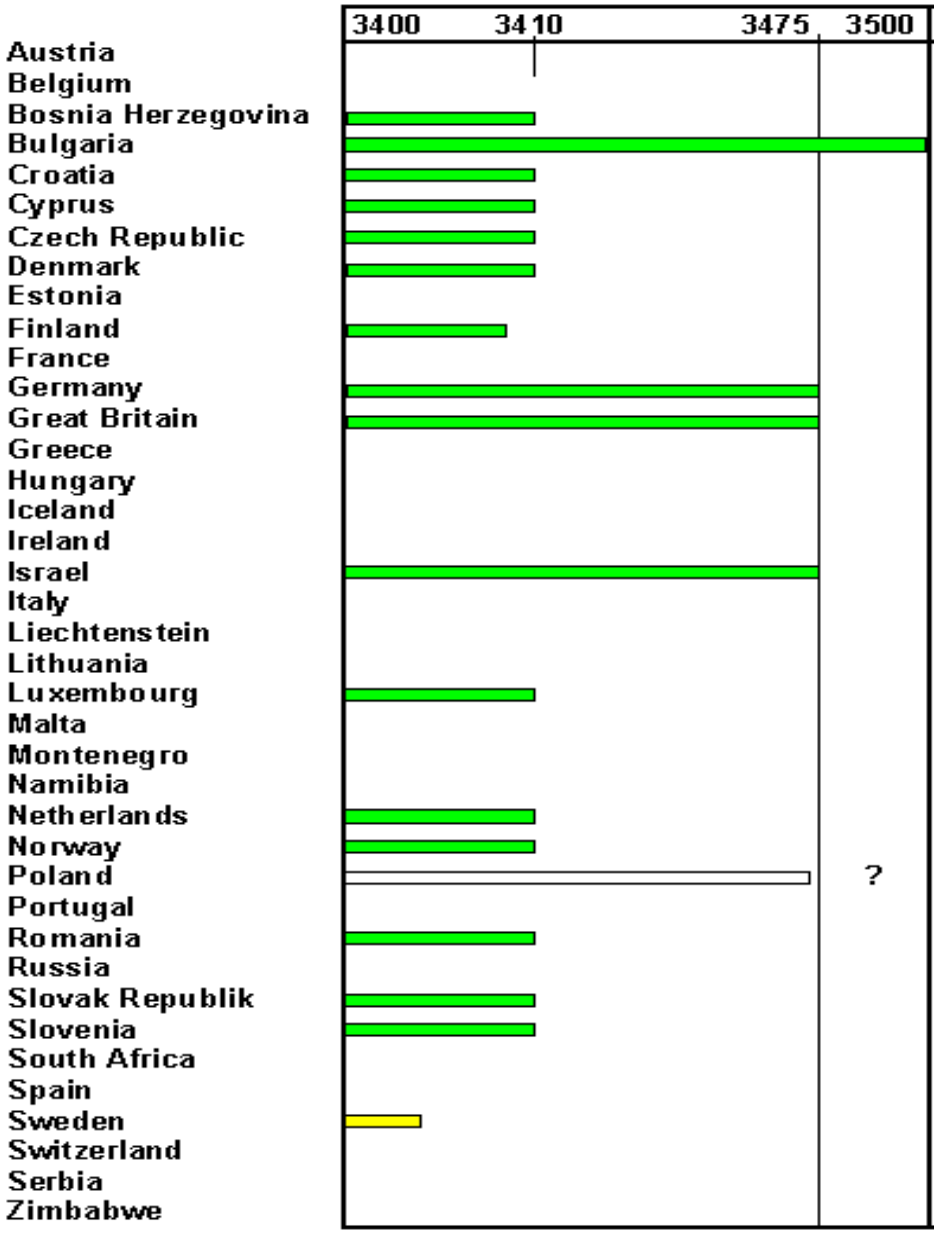

Figure-1: Amateur Service Allocations in the 3400 MHz Band as at November-2006

Notes:

- Poland allocation is based on EFIS website output but unconfirmed
- Permits are available to amateurs in Sweden and Switzerland
- The Amateur Satellite Service is also allocated in Denmark

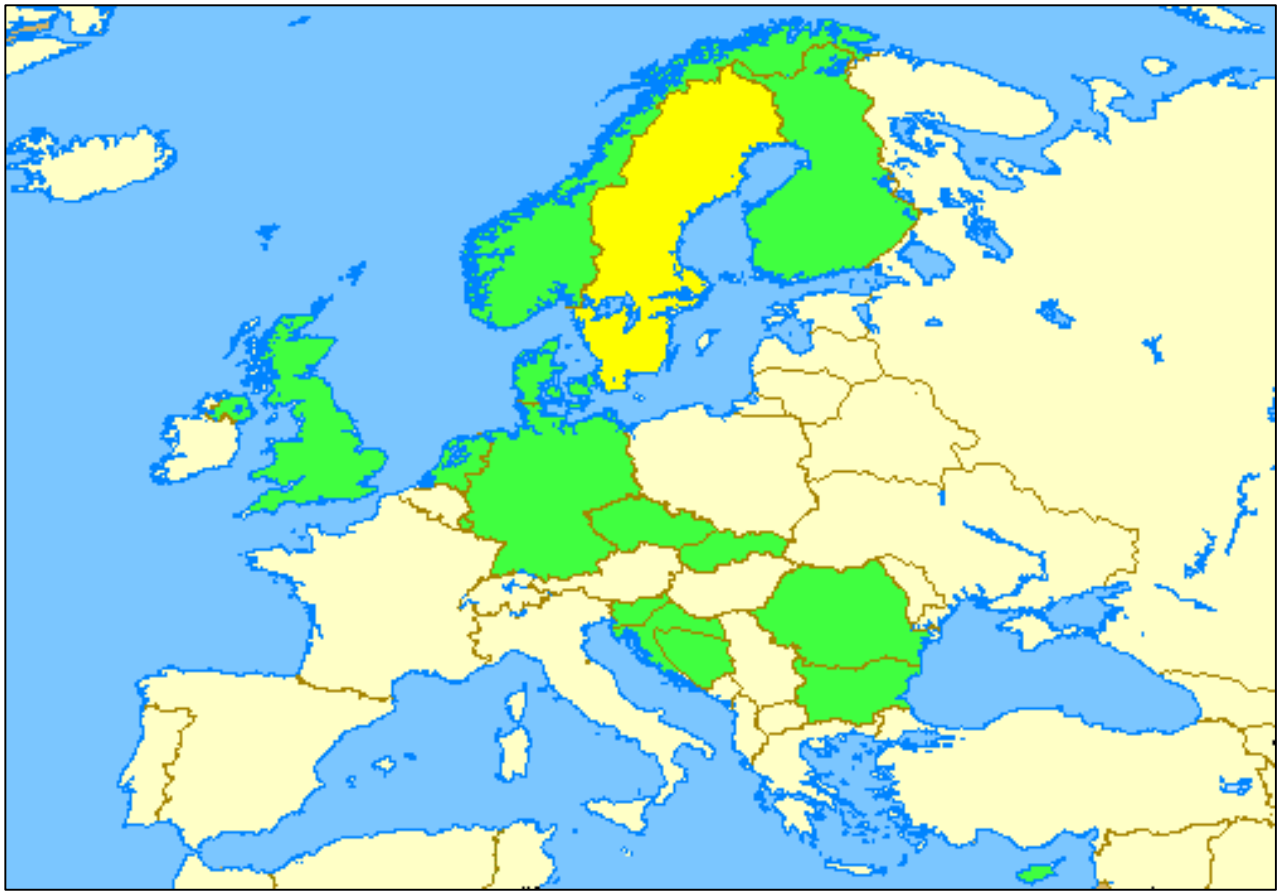

Figure-2: Countries with confirmed 3400MHz band Amateur Service Allocations as at November-2006

Note: At time of writing, Poland was unconfirmed and Sweden is based on 2006 permits

Annex-1: Current Amateur Service Usage

Usage by the Amateur Service is concentrated within the 3.40-3.41GHz sub-band. The European Amateur Test & Propagation Beacon Network resides in the 3400-3401MHz range, with weak signal communications between individual amateurs conducted at 3402MHz over ranges of typically 200-400km (with records up to 900km) – fully aligned with EU17.

Communications are largely of a CW/SSB nature, with detection thresholds increasingly assisted by innovative signal sources, narrowband receivers and 'Spectran' weak signal reception software.

For information the active Amateur Service Beacons as of 27th May 2006 are listed below, courtesy of the UK Microwave Group Beacon Monitoring Service:-

Frequency	Callsign	Locator	Nearest Town/City	Power	Antenna	Direction	Height (m asl)
3400.025	DB0HF	JO53BO	Hamburg			SSW	65
3400.040	DB0KI	JO50WC	Bayreuth	50/Verp	Slot	Omni	925
3400.045	DB0EZ	JO31BS	Kleve	1.2Verp	Schlitz	Omni	100
3400.050	DB0JL	JO31MC	Munster	1Verp	Helical	Omni	195
3400.060	DB0MFI	JN58KR	Pfaefflingen	10/Verp	slot	Omni	532
3400.080	OK0EX	JN79OW	Vysoka				500
3400.085	DB0AS	JN67CR	Rosenheim	0.5Verp	2 slot	10°	1565
3400.090	S55ZMS	JN86CR	Dolina	0.5W	Slot	Omni	350
3400.160	PI7CKK	JO33GE	Groningen	5Verp	Slotted	Omni	55
3400.400	OK0EL	JO70SQ	Benecko	0.1Verp	Horn 5dB	West	900
3400.800	DB0KHT	JO40FE	Kronberg	10/Verp	Horn	Omni	247
3400.800	OH3SHF	KP11VK	Tampere	13.5/Verp	Alford Slot	Omn	222
3400.810	DB0ANU	JN59GG	Ansbach	10/Verp	Dish	NW	
3400.830	GB3MHS	JO02PB	Ipswich	75/Verp	2 x slot wg	090/270	
3400.833	DB0FGB	JO50WB	Schneeberg	10/Verp	slot wg	Omni	1100
3400.850	DL0UB	JO62KK	Berlin	12/Verp	Slot	Omni	120
3400.850	DB0GW	JO31JK	Duisburg	8Verp	Helical	Omni	80
3400.888	OM0MZA	JN88NE	Bratislava	0.11W	Horn	45°	
3400.900	ON0VRT	JO20CS	Brussels	50/Verp	10dB Colinear	Omni (vert)	295
3400.900	GB3OHM	IO92AJ	Birmingham	1W	8 slot	Omni	171
3400.905	GB3SCF	IO80UU	Poole	15/Verp	Alford Slot	Omni	287
3400.910	GB3ZME	IO82SQ	Telford	15/W	Slot 14dBi	South-East	198
3400.912	DB0RG	JO51GO	nr Bad Sachsa	5Verp		Omni	690
3400.930	OZ7IGY	JO65GP	Copenhagen	30/Verp	Slot wg	Omni	20
3400.945	DB0AJA	JN59AS	Würzburg-Gieshügel	20/W	3x Sect.horn	Omni	
3400.955	OZ1UHF	JO57FJ	Frederikshavn			Omni	150
3400.973	OK0EQ	JN89AR	Svratka	1Verp	Slot	Omni	745
3400.064	GM4LBV	IO86RQ	Montrose	15/W	Sect Horn	120°	