

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Ultra-Wideband

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Representing organisation: Chelmsford Amateur Radio Society (CARS).

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing

Name/address/contact
details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts?

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

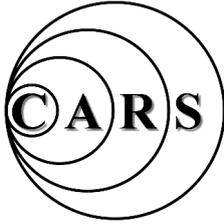
Yes

No

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and I authorise Ofcom to make use of the information in this response to meet its legal requirements. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Name: *Chris Chapman & John Bowen*



Chelmsford Amateur Radio Society

Established 1936

Affiliated to the RSGB

Club Callsign: G0MWT

President: Harry Heap G5HF

Chairman: Chris Chapman G0IPU

Secretary: Martyn Medcalf G1EFL Treasurer: Brian Thwaites G3CVI

CARS Ref: 20050324

Web Address: www.g0mwt.org.uk

24-March-2005

Response to Ofcom 'Ultra Wide Band'

Introduction

Chelmsford Amateur Radio Society (CARS) is a vibrant club with over 100 active members holding Amateur Radio Licences. Based in and around Chelmsford, Essex, it is nationally recognised as playing a very active role in Amateur Radio across a wide range of activities including social, operational and development/training aspects.

The Club is affiliated to the national body, the Radio Society of Great Britain (RSGB). CARS members collectively have a huge range of technical experience and operate from HF to the microwave bands.

With roots going back to the 1930s, the club draws much of its membership from professionals in the electronics and radio field. Chelmsford Club has Members who have worked for or assisted the GEC-Marconi Companies and other major employers (including BT) in the district & in London.

CARS have a Monthly Meeting at which lecturers are invited from all walks of life as well as radio, TV and broadcasting. This is to give our Members a better understanding of radio & the hobby we all enjoy.

We are appalled that the Spectrum which everyone agrees is finite is to have huge amounts of bandwidth polluted by UWB which will raise the noise floor.

We attach our views more specifically against Ofcom's questions below.

Ultra-Wide-Band (UWB).

Consultation Questions and Answers submitted on 24th March 2005

Q1: Are these the appropriate topics to be consulting on?

Yes & No.

Yes, we are happy for Ofcom to Consult on UWB, but not so happy that it's Proposals basically indicate it will be deployed regardless of informed Comment & Responses. Ofcom seems to be Judge, Jury and Executioner.

UWB is very new and very unknown from a practical field test point of view.

We would have thought it prudent to go gently, not rush in and upset all users of this part of the RF Spectrum.

Since UWB is proposed to be "unlicensed" it will be Non Revenue producing - what is the fuss about when it may interfere with high Revenue Paying, Licensed users?

It is good to get other persons ideas but Ofcom should be paying more attention to the views of ITU, CEPT and the EU *before* allocating any frequencies to UWB.

Q2: Do you agree with this analysis of our statutory duties?
Are there any important factors that have been omitted?

How can Ofcom be so sure that UWB will not create havoc?

Having read a number of Reports we are not convinced that anything other than a narrow range of biased commercial UWB related ideas have been proposed.

We do not believe that Ofcom's duties have been interpreted in a fair manner for other spectrum users

Q3: Do you agree with the economic study? Are there other studies that Ofcom should be conducting?

We do not consider a series of minor Papers & Reports justifies potentially causing havoc to many Radio Spectrum users.

Besides Economic Studies there are Safety Issues to be considered.

If UWB increases the Noise Floor of the Mobile Phone Handset, the transmit power level of the Handset will be increased. This will increase the potential of brain damage in young children & frequent users. There are now some 26 million users & we do not think this aspect has been explored with the NRBP. The alternative would be an increase in the number of Phone masts which have their own environmental impact issues

Q4: Is there a better way that future use of the spectrum could be taken into account?

Yes - do not rush into UWB in such a cavalier manner.

Q5: What is the most appropriate solution to the potential interference from UWB to BFWA?

You should be able to tell me - you should know all the users involved.

The frequency range you propose to "upset" is vast. Throughout the 7.5GHz of spectrum in question (3.1-10.6GHz) plenty of Primary and Secondary users are gravely concerned

Q6: Would it be possible to achieve sufficient isolation between radio astronomy and UWB through practical methods of physical separation?

No comment - a panel of Radio Engineers are needed to decide

Q7: Are there any other options that we should consider?

Yes, do nothing until Ofcom & the International Committees are in agreement.

Q8: Are there any major technical studies that we have omitted?

Yes, we are certain there must be many. For example we do not see anything significant supporting the efforts of the Radio Amateur.

The frequencies that UWB could interfere with include a number of Radio Amateur frequencies.

These have been allocated to the Radio Amateur for many years.

From Ofcom's own records in the BR68 Schedule:-

Frequency, GHz
1.215-1.325
2.3-2.45
3.4-3.475
5.65-5.85
10-10.5

Without going into exact detail, most of these bands were 400 Watts PEP. Even though we are Secondary users, nonetheless we would not expect interference from Tertiary ones.

We know that some of these frequencies have been limited but we are making the point that in 25 years time, who knows what will be required in these frequency bands. If noisy unlicensed transmitters swamp them – no-one is going to gain.

Since UWB is Unlicensed & Ofcom have now hardly any enforcement Staff, who is going to find illegal UWB users with more powerful equipment than you would like which are causing interference to Radio Amateurs and other Licensed users?

Q9: Have we made an accurate assessment of the existing studies?

No. If Ofcom do not consider International opinion how can they! For example the French ANFR who we think have a lot of expertise do not agree either, we would like a response to their comments

Q10: Do you agree that we should seek a common European framework for the introduction of UWB?

Absolutely. What an obvious question

Q11: Have we proposed the most appropriate mask?
Will it be possible to deliver equipment conforming to this mask?

Again, a team of International RF Engineers to advise.

Q12: To what extent should we define parameters such as those listed above?
What is the most appropriate definition for each of these parameters?

Answer as Question 11.

Q13: Is our proposed approach to international bodies appropriate?

We are at a loss as to know what your "approach to international bodies" is.

Ofcom seem to want to have ignored quite a lot!

Ofcom should do nothing on their own until the International Committees are in agreement.

Q14: How should we best deal with the precedent potentially set by our proposed approach to UWB?

Put it on the "back burner" until Ofcom have sorted out themselves and truly understand the immense task of running an International RF Spectrum. This cannot be carried out by clerical, broadcasting or business school Staff, nor left to outside consultants who are not necessarily independent.

Q15: What should Ofcom's role be in setting and monitoring EMC standards?

Put the clock back four years to the days when the RA did its job as we generally felt it should be carried. Ofcom are guilty of withdrawing from EMC and Interference enforcement, and UWB shows just how exposed the entire UK now is.

What can Ofcom demonstrate it does in the way of Monitoring Interference?.

What happens when Interference is found - where are the personnel to actually find the source?.