

Draft ECC Report 25: The European Table of frequency allocations and utilisations in the frequency range 9kHz to 3000GHz



Response by the Radio Society of Great Britain

Introduction

The Radio Society of Great Britain (RSGB, www.rsgb.org) welcomes the opportunity provided by CEPT to respond on the recently published revised 2008 Common Frequency Allocation Table (ECA) on behalf of its members and the wider UK Amateur Radio community.

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 enjoyed by many millions of 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.

Comments

The RSGB welcomes a) the recognition given by the European footnote EU9 to the Amateur Service status in some CPT countries on 70.0 – 70.5MHz and b) the inclusion of the ITU Radio Regulation footnotes 5.67A and 5.67B in respect of resolutions agreed at WRC-07 in respect of the Amateur Service secondary allocation in the band 135.7 – 137.8kHz.

The RSGB considers that two additions need to be made to the Table in order to reflect current utilisation. These are:

a) Frequency Band 495 – 505kHz

The addition proposed is the inclusion of note “Amateur experimentation in the band 501 – 504kHz and 505.0 – 505.2kHz”. A suitable footnote could be “CEPT National Administrations may allocate to the Amateur Service on a secondary non-interference basis for experimental purposes, subject to annual review and an upper erp limit of 13dBW.”

The rationales behind this proposed addition are

1. The demise of the former distress and calling frequency of 500kHz and the associated removal of footnote 5.083 in the ITU Radio Regulations at WRC-07.
2. The issue of a permanent allocation for the Amateur Service in this frequency band is on the provisional agenda for WRC-11.
3. Administrations in several European/Scandinavian countries and the USA have released spectrum on a temporary basis without any noticeable interference to the primary user.

b) Frequency Band 5250 – 5400kHz

The additional proposal is the inclusion of note “Amateur experimental activity on specific 3kHz wide channels between 5288.5 and 5403.5kHz”

The rationales for this proposed addition are

1. A number of channels have been allocated to Amateur Service experimentation on a secondary, non-interference basis, by the Administration in the UK, with the following channels currently allowable: 5258.5, 5278.5, 5288.5, 5366.5, 5371.5, 5398.5 and 5403.5kHz. All frequencies are the nominal carrier frequency of USB SSB transmission.
2. The Amateur Service has an outstanding requirement for 150kHz of usable spectrum in this area for propagation research, specifically Near Vertical Incidence Skywave propagation, and for general/emergency regional communication coverage.

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

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RSGB, July 2008