

Submission 174 MHz to 184 MHz: Land Mobile Radio consultation paper

Thank you for the opportunity to make a submission.

I am a self employed Radio Contractor and Approved Radio Engineer, part of which my work is to carrying out frequency allocation and licensing work for clients. This includes allocation of "E" and "EE" band channels. I am not affiliated to any radio organization and I work with independence and impartially.

Regarding the proposed band plan, I would like to have seen more EE spectrum made available for land mobile users.

In general, I have no issue with the intentions contained in the proposal but would like to make the following comments:

Q2. Q3.. Allocation regime and Management Rights. I strongly disagree with the proposal of farming out any of the 174-184MHz band to a private Management right, and comments from smaller clients I work for, agree. The issue is that of possible bias and favoritism from any future band manager of this spectrum, disadvantaging competitive and smaller users at their whim, and in extreme cases, a "hostile" band manager could prohibit any competition or if not, charge exorbitant fees.

It seems that Q11 through to Q31 relate to so much regarding private management rights, that the proposal is almost a foregone conclusion!

Q46. Q47. RSM Radio Licensing have already allowed ARC/ARE's to allocate "reverse" and simplex channels at elevated Land mobile repeater sites, causing site sense issues. Why is this allowed when in breach of PIB38 P 3.5 and PIB58 3.14.1 ? Either this should be enforced, or taken out of the rules

Q50. The present "E" and "EE" allocations are getting somewhat crowded, especially in the central NI area. There is one utility (not in the radio industry) who has recently taken 100+ "EE" channels, many of which are not in use, making new allocation more difficult. A "use it" or "lose it" rule should therefore be introduced to relieve this type of "frequency denial" activity.

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