



# The Hong Kong Radio Control Soaring Society

## 香港遙控滑翔飛行協會

[www.geocities.com/hkrcss](http://www.geocities.com/hkrcss)

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April 25, 2002

Your ref: (367) in OFTA P49/17

Mr. Warren Kwok

Office of the Telecommunications Authority

29/f Wu Chung House

Queen's Road East

WANCHAI

Dear Mr. Kwok,

Re: Frequencies for Model Control

Thank you for your letter dated 27<sup>th</sup> March 2002. In case it is relevant, we shall clarify from the outset that we are applying to you to allocate more frequencies for model control for use by all members of the public. At no times did we seek the allocation of frequencies for the exclusive use of our members.

### 1. Our understanding of OFTA's position

Returning to the issues raised in your letter, it seems to us OFTA's position can be summarised as follows: since there are few or no applications from our members for Model Control Licence in respect of 72.080 and 72.960 MHz (the "2 permitted channels"), there is at present no evidence of frequency congestion on these frequencies justifying our request for more model control frequencies. Until there is a significant number of applicants for the 2 permitted channels thus indicating frequency congestion, OFTA will not consider allocating more bands for model control.

### 2. Why is it too harsh on us?

If the above does represent OFTA's position, we submit it is unduly restrictive and harsh for the following reasons.

- (i) Frequency crystals for 72.080 and 72.960 MHz suitable for use by our radio equipment are no longer available for sale in Hong Kong, apparently because these 2 frequencies are unique to Hong Kong and manufacturers no longer produce them for such a relatively tiny market. Manufacturers only produce r/c sets for big markets such as US (72MHz band with 20kHz spacing for which unfortunately 72.080 MHz and 72.960 MHz are not the specified channels) and UK (35MHz and 40MHz bands). You are invited to verify this with local model shops, names and contact details of which are presumably well known to you since they are required to hold the relevant radio dealer licences issued by OFTA.

In the circumstances, it is practically impossible for our members to apply for the proper Model Control Licences from OFTA. The alternative of using the licence free 27MHz for model aircraft control has been agreed by you in your email of 5<sup>th</sup> March, 2002 to be unsuitable.



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We shall add that the inability of our members to apply for licences may also affect their 3<sup>rd</sup> party insurance coverage in that the insurers may decline liability on the basis of illegal use of unlicensed radio equipment, leaving the 3<sup>rd</sup> party victim without adequate compensation in the event of an accident;

- (ii) We note you say that no applications for licence have ever been received from our members. We do not know the precise number of *existing* licenced users in respect of 72.080 and 72.960 MHz but assume there are plenty given that it has been some 20 years since these frequencies were allocated for model control. We take the view that with only 2 permitted channels, it takes just tens of *existing* licenced users, let alone more applicants, for one to conclude that only 2 permitted channels are plainly insufficient and an enlargement is absolutely necessary.

Incidentally, your expression that none of our members has ever applied for licences is factually inaccurate since some of them have done so. These include our Treasurer Mr. Willy Lim who has been in possession of a Model Control Licence (no. 8167) since 1996;

- (iii) If we are strictly allowed the use of only 2 channels, it will be virtually impossible for us to hold any meaningful competition in future, without which it is difficult for us to improve the standard of the hobby in Hong Kong. This 2 channels restriction will also seriously hamper our effort to promote the hobby to the public for the simple reason that only 2 planes can be flown at the same time. Such an outcome will be disturbing and will contradict the endorsement to our hobby by the Leisure and Cultural Branch of the Government and other organisation in the community such as the Hong Kong Air Cadet Corp for which we help to train their students through the use of r/c model gliders;

- (iv) As you can see from our previous emails to you, no industrialised countries we know of have such a restrictive policy on the allocation of frequencies for model control as Hong Kong. Each of them has dozens of licence-free channels reserved for model control. We in Hong Kong only have 2.

You may have argued that Hong Kong is a small place, so that if a big country like US has allocated dozens of channels for modelling use, two channels should be sufficient for Hong Kong. We submit that such argument is flawed. Hong Kong has a higher density of r/c modellers than the US, such that the likelihood of 2 users of the same frequency (1 of the 2 permitted ones) operating in the vicinity therefore causing mutual interference is higher. The situation definitely calls for the allocation of more r/c channels in Hong Kong.

Further, we may organise competitions involving contestants from overseas and in this regard, we can foresee the 2 channels rule being a source of red tape, inconvenience and discouragement to them, in that not only are they restricted to 2 channels, but they must also apply for licences from OFTA before they can bring along their radio gear to Hong Kong, let alone actually using them in competition locally. As far as we are aware, the practice in most Western countries is that the host country organisers will inform the visitors the permitted bands (which are a lot more than in Hong Kong) in the host country. The visitors will then ensure that their r/c equipment use these bands. Licenses are never or rarely required. OFTA has followed this unduly restrictive 2 channels rule for more than 20 years, and we strongly believe it's time for OFTA to bring this matter to Western standard by allocating more frequencies for model control, preferably on a licence free basis;



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- (v) We have been reminded by the Civil Aviation Department in writing to conduct our model flying activities in a safe manner, and we are treating the matter seriously. If only 2 channels are allowed to be used at the flying fields, model flying will be dangerously prone to mutual radio interference causing model crashes and potential property damage and personal injury. We have no wish of seeing our effort in promoting flight safety undermined by some unduly restrictive telecommunication policy such as this "2 channels" rule. We value OFTA's effort in regulating the spectrum to avoid potential interference among users, but we suspect, for the reason just explained, this "2 channels" rule actually causes us more interference rather than less;

While we can exercise some form of frequency control at the flying fields to ensure that no 2 transmitters on the same frequency will operate at the same time, we are unable to control other operator(s) on the same frequency nearby, each group being out of sight of each other but still within each other's radio range. Obviously if significantly more frequencies are allowed by OFTA, the risk of this happening will be much reduced, thereby enhancing the safety of model flying and the public nearby; and

- (vi) For other reasons in support of our application, please refer to our previous emails to you.

### 3. What we are requesting OFTA to do

By reason of the matters mentioned above, we submit there is a pressing need for OFTA to allocate more frequencies for model control on the following bands, preferably on a licence free basis:

- (i) 72 MHz as you offered in your letter, the 20 kHz channel spacing should be in line with the relevant international standards;
- (ii) 40 MHz band in the range 40.665 to 40.985 MHz as you indicated in your email of 8<sup>th</sup> March, 2002. We take the view that these frequencies, being valuable public resources, should not be left unused and wasted, and it is entirely in the public interest to allocate them for modelling use where there is such a demand in the community.
- (iii) Other bands such as 36, 41, 60 and 75 MHz which have not been ruled out in your previous correspondence.

We urge you to consider this matter seriously and look forward to receiving your early reply. In the meantime, if you have any queries, please do not hesitate to contact me.

Yours sincerely,

Stanley Chan  
Secretary,  
The Hong Kong Radio Control Soaring Society