

**Online Response: 19 June 2006**

**Title:** Mr

**Forename:** Kenny

**Surname:** Kamal

**Name and title under which you would like this response to appear:** Technical Director

**Representing (self or organisations):** Organisation

**Organisation Name :** MLL Telecom Ltd

**Email Address:** k.kamal@mlltelecom.com

**Keep nothing confidential:** on

**Keep whole response confidential:** No

**Keep name/contact details/job title confidential:** No

**Keep organisation confidential:** No

**Keep part of the response confidential:** No

**Which parts?:**

**Publish response summary?:** Yes

**Read declaration:** Yes

**Publish after consultation?:** Yes

**Question 1: Do you agree that the Amateur and Amateur-Satellite allocations in the 75.5 - 76 GHz band should remain in the UK Frequency Allocation Table after 31st December 2006 on a secondary basis? If not, what would you suggest as an alternative approach? Also, what is your view on permitting the secondary Amateur and Amateur-Satellite allocation in the 81 ? 81.5GHz band within the UK Frequency Allocation Table?:** MLL is agnostic on this point

**Question 2: Do you agree that a light licensed approach is appropriate to facilitate access to the 71-76 GHz and 81-86 GHz bands? What are your views on the need to provide a regulatory mechanism for interference protection of fixed links operating in the 71-76GHz and 81-86GHz bands? Do you agree that links registered in the database require a date/ time priority rule for establishing interference protection of links?:** MLL has extensive experience of the light touch license regime as used for the 5.8 ghz band. Our concern is that this system does need some further development to ensure a better level of service is provided. This

particularly relates to license renewals and queries. MLL further believe these bands are ideally suited to this licensing approach

Due to the types of services that can be delivered using this spectrum, we believe that a robust system needs to be out into place for interference protection

This system does offer challenges in being able to make best use of these bands to deliver service on a commercial basis. If a user registers a number of paper links they will have the benefit of this system and the new user will be at disadvantage. The issue of paper links or non working links needs to be addressed.

**Question 3: Do you agree that a fee based on £50 per link per year provides the right balance between allowing access to spectrum and discouraging the hoarding of ?paper? links within the registration Database. If not, what would you suggest as an appropriate fee to achieve these aims?:** MLL does agree with the suggested fee, however we would also suggest a further condition be placed that these links must be used for commercial use. Otherwise the the sterilisation of the bands is a real possibility through the use of paper links.

**Question 4: Do you agree that the CEPT channel plan ECC/Rec(05)07 should not be mandated and that a flexible band structure comprising of two national spectrum blocks of 4.75GHz is appropriate for facilitating access to the 71-76GHz and 81-86GHz bands?:** MLL agrees with this approach.

**Question 5: In addition to the date/time priority rule do you think it would be beneficial for Ofcom to set a maximum interference threshold policy for the 71-76GHz and 81-86GHz bands? If so, do you have suggestions for the criteria and how this could be assessed?:** No

**Question 6: Are there any regulatory impacts or other considerations not otherwise mentioned in this consultation that you believe are relevant to the 71-76GHz and 81-86GHz bands?:** No Comment

**Additional comments:**