

Lakeside House
Cain Road
Bracknell
Berkshire
RG12 1XL

E-Mail: dawn.Longman@cw.com

Direct Tel: 01344 818309

Mr Alex Dixon
Ofcom
Competition Group
Riverside House
2a Southwark Bridge Road
London
SE1 9HA

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Dear Alex

Making Spectrum Available in the 71-76 GHz & 81-86GHz Bands

Cable & Wireless welcomes the opportunity to comment on Ofcom's proposals to open the 71-76 GHz and 81-86 GHz spectrum bands for point to point broadband fixed wireless systems on a light licensed basis.

We are generally supportive of the proposals in the consultation document. Very often we see situations where high bandwidth services are required but where it is prohibitively expensive to lay fibre optics, not to mention slow and disruptive to the local infrastructure. This innovative wireless solution will help overcome this.

Responses to the specific consultation questions are attached.

Yours sincerely,

Dawn Longman
Manager, Regulatory Strategy

Cable & Wireless response to the specific consultation questions

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 – 81.5 GHz band within the UK Frequency Allocation Table?

Cable & Wireless agrees that the 75.5 – 76 GHz Amateur and Amateur-Satellite allocations should remain in the UK Frequency Allocation Table after 31st December 2006 on a secondary basis.

With regards to the 81 – 81.5 GHz Amateur and Amateur-Satellite allocations, we have no objection if Ofcom opens these frequencies, provided the allocation is properly managed to allow 71-76 / 81-86 GHz fixed services to coexist.

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 71-76 GHz and 81-86 GHz bands?

Do you agree that links registered in the database require a date/ time priority rule for establishing interference protection of links?

Cable & Wireless supports Ofcom's proposal for a light licensed approach to the 71-76 / 81-86 GHz bands. In particular, we believe it is important that any online process that requires the licensee to provide basic data about the physical location and other basic parameters of the link under its control should remain as simple as practically possible. Because extremely critical data will be transmitted over the link, we look to the coordination system to guarantee that we will not be subject to unexpected interference. An interference protection mechanism is therefore an important and necessary part of this licensing process in our view.

We support the idea that applications should be date / time stamped, to ensure that links already registered on the Database take priority over those registered later.

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?

We believe the £50 fee is an appropriate fee for this sort of license on a link-by-link basis.

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 4.75 GHz is appropriate for facilitating access to the 71-76 GHz and 81-86 GHz bands?

Cable & Wireless supports Ofcom's proposal for a band structure consisting of two national spectrum blocks of 4.75 GHz each. We believe that the flexible approach proposed will enable and encourage the introduction of innovative broadband solutions.

We note that CEPT channel plan ECC/Rec(05)07 defines 19 x 250 MHz channels in both the 71-76 GHz and 81-86 GHz bands, and permits aggregation of up to all 19 channels in each band. As such, the Ofcom proposal of two spectrum blocks of 4.75 GHz is equivalent to the limits of the CEPT recommendation.

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 71-76 GHz and 81-86 GHz bands?

If so, do you have suggestions for the criteria and how this could be assessed?

We believe it is important to have a maximum interference threshold policy. Data transmitted over these links will be critical to our/our customers' operations over these links, and we believe such a policy is a reasonable step to ensure the integrity of our/our customers' transmissions.

Question 6:

Are there any regulatory impacts or other considerations not otherwise mentioned in this consultation that you believe are relevant to the 71-76 GHz and 81-86 GHz bands?

There are no other points that we feel need to be considered.