

Question 1: Do you have any comment in relation to the authorisation of MCA systems on the basis of a common European approach?:

Yes.

Re note 1.12

I believe it is essential that deployed aircraft frequencies are not limited to 1800MHz and must cover the same spectrum that is available to terrestrial networks. The current approach will stimulate the sale of 1800MHz band handsets and therefore is unfair to the terrestrial operators that hold licences in different frequencies. Through this regulation OFCOM gives a technological advantage to some operators and limits the others.

Question 2: Do you agree that the ECC Decision and associated technical requirements and limits will adequately protect terrestrial networks?:

No, I disagree.

Re: note 2.15

I too believe the NCU proposed has the functionality of a jammer as it blocks the outside signal with white noise. Such approach seems illegal and I strongly condemn its use. A different method of protecting terrestrial networks must be implemented, like frequency hopping for example. Jamming signals for whatever cause should not be allowed in the air as it is not allowed on the ground.

Question 3: Do you agree that the initial authorisation regime of equipment for MCA should be via licensing rather than licence-exemption?:

Yes

Question 4: Do you agree that the aircraft operator should be the licensee of the radio equipment used for MCA on board?:

No.

In view of the above, it is therefore the service provider that should be responsible for integration of the system and hence SP should be licensed directly.

This will help to coordinate a smooth handover from terrestrial to aerial network, without distortion to ground systems as same frequencies will be used. It is therefore up to the SP to obtain two licences, for the departure and for the arrival countries.

Question 5: Do you agree that the authorisation of radio equipment for MCA in the 1800 MHz spectrum band should be granted via a NoV to the existing aircraft licence?:

No, its n/a as per above answer.

Question 6: Do you agree that under the current licensing framework no additional fee should be payable for MCA spectrum authorisation?:

No.

Additional fee may be charged by OFCOM if additional licences are issued.

If however certain restrictions are simply removed, then no additional fees are necessary.

Question 7: In your opinion, do you think that MCA services would fall within the scope of the EC Regulation on roaming? Please explain why you think that MCA services would or would not fall within the scope of this regulation?:

Yes, they must.

It is essential to provide a fair service at a fair price. Should this restriction be lifted SP will not be regulated and consumers will suffer.

If anything, the regulation may be amended, but still should be applicable.

Comments:

Generally i agree with OFCOM's intentions to allow mobile communications in the air, but I disagree with OFCOM's approach to it.

This service must be fair, available to all users of different networks, it should be regulated and without any illegal jammers.