

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

No

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

This seems likely although the noise floor (at ground level) along aircraft corridors will be higher - possibly corrupting high-level ground usage in some areas.

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

Yes. This would help regulate jammer usage (see response to Q4).

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

Yes, if the aircraft operators are capable of assessing the following:

There must be a maximum radiated power that can be tolerated within the aircraft before breakthrough in the electrical systems becomes possible. The on-board jammer would normally be at a sufficient power to just block ground-station transmissions within the aircraft. However, if this power rises (or some rogue hand-held device is used to jam on-board signals), each GSM handset could ramp-up its power level to the maximum: 1 watt (2 watts peak power) [CDMA typically below 1 watt]. Although unlikely that all the passengers (524 to 416 on a Boeing 747) will be using their phones at any one period, are the aircraft operators happy that such power levels will not affect the aircraft navigation (or operational) systems?

This response does not consider possible accumulated harmful radiation aspects.

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?:

Yes, but only if the above scenario can be proven not to be a hazard to aircraft operation or personal health.

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

Yes

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?:

For flights within Europe, yes. However long-haul flights may also be subject to other constraints.

Comments:

If mobile channel usege is limited to a small number of user devices at any one time (e.g. 5), this could limit the annoyance factor to other passengers and also total radiated power within the cabin.

Stuards would also need to request passengers to use very quiet voices when communication or have the power to terminate the service.