

Mobile Communications onboard Aircraft

T-Mobile welcomes the opportunity to comment on Ofcom's Consultation on the introduction of mobile services on aircraft. We have not commented on Airline safety requirements or 'human factors' which are outside the scope of this consultation.

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

The development of an RSC Decision and COCOM Recommendation

T-Mobile agrees that by the nature of this service, it is important to work within a common European approach. In this regard we support the development of the RSC decision and associated Recommendation for operation of MCA within EC member states.

The RSC Decision should be fully aligned with the technical annex in ECC/DEC/(06)07. In the annex of the ECC Decision, it is stated that:

- "The requirements for operation of an Airborne GSM system, which would ensure avoidance of interference into terrestrial networks, are highly dependent on many factors of the System, including the aircraft size and type, its RF isolation characteristics, propagation characteristics within the cabin and the installation of the onboard system."
- "Administrations wishing to authorise the operation of Airborne GSM systems may require that documentation describing the evaluation of installation be provided as part of the authorisation of the Airborne GSM system".

We believe that the RSC Decision must require documentation specifying the specific power levels allowed for the aircraft in accordance with ETSI standard EN 302 480. These power levels are much easier to monitor in everyday operation than the eirp levels outside of the aircraft in flight. We understand that in some cases the permissible eirp levels do not always guarantee service in all areas inside the aircraft, and that there could therefore be an incentive to raise the picocell power levels after authorisation to serve all customers - which would be a breach of the decision.

It could be argued that such documentation is part of the information to be recorded in the proposed EU register of aircraft authorised for MCA services in Europe. T-Mobile notes, however, that the EU register in the draft COCOM Recommendation is still under discussion and has not been finalised. In addition, the final COCOM Recommendation will be non-binding and will not require all EU Member States to provide aircraft information to the EU MCA register. T-Mobile believes the requirement for sufficient installation documentation of the aircraft providing MCA services must be included in the RSC Decision.

T-Mobile therefore believes that the RSC Decision must ensure that there is adequate installation documentation, in particular specifying the power levels allowed.

We support the GSME position paper which is available at:

http://www.gsmworld.com/gsm europe/documents/positions/2007/gsm e_position_on_mca.pdf

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

T-Mobile has been active in the technical bodies responsible for the production of the ECC Decision and is reasonably content, based on information and arguments provided at the relevant meetings that this should, if implemented by all administrations, provide adequate protection of the frequency bands and technologies studied to date. CEPT SE7 is currently studying the 2500 – 2690 MHz band and we expect this band to be included within a revision to the ECC Decision.

However we are still concerned that if interference occurs to our spectrum then it will be difficult and time consuming to get this resolved. If the system is licensed by another administration, the resolution of interference disputes may take many months to resolve involving loss of revenue for our network. Thus T-Mobile believes that a requirement for documentation on the installation of MCA service equipment must be included in the RSC Decision. In addition, T-Mobile supports the establishment of a EU MCA Register as proposed by the draft COCOM Recommendation as well as the explicit inclusion of the harmonised ETSI standard EN 302 480 or an equivalent standard as a pre-condition for MCA authorisation in the COCOM Recommendation.

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

T-Mobile would strongly support the proposal that the authorisation for MCA should be via licensing rather than licence-exempt. We agree with the arguments provided in paragraphs 3.4 and 3.5 i.e. that a policy of licensing of MCA is appropriate given the uncertainty surrounding the performance of these systems in operation and the substantial risks to terrestrial networks if they were the victims of interference. Also if any enforcement action is necessary this may be more easily taken under a licensed approach than under a licence-exempt approach.

Question 4. *Do you agree that the aircraft operator should be the licensee of the radio equipment used for MCA?*

T-Mobile supports Ofcom's opinion that the aircraft operator should be the licensee of the radio equipment for MCA.

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

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

T-Mobile has no opinion on questions 5 and 6.

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.*

T-Mobile believes that MCA services do not fall within the scope of the EC Regulation on roaming. T-Mobile believes that the drafters of the roaming regulation explicitly chose to limit the Roaming Regulation to terrestrial public mobile telephone networks, in that the regulation's scope is clearly defined as applying to terrestrial mobile telephone networks throughout the document. The activities for preparing the necessary analyses and legal considerations for MCA services in the technical and regulatory committees of CEPT were well underway at the time the EC Regulation on roaming was drafted.

T-Mobile (UK)
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