

Q3: Are there any other issues of sufficient significance to merit mention in this document?

I note that other spectrum user-groups do not yet seem to figure in the consultation process or have consideration given to their needs.

These user-groups operate businesses that do not draw revenue from services - directly related to spectrum use - but need to use spectrum during the design, development and test of instruments and equipment.

Some of these companies design and develop multiple use equipment, that may be used on any frequency over a wide range of spectrum - e.g. testing of wide spectrum antenna, RADOME testing.

In other areas of product development, there may be a need to test transmitter equipment at full power at various frequencies in the transmitters range of operation. Such equipment may not be for the UK market and therefore may not comply with the interface requirement for the frequency range in question. e.g. RADAR testing.

Historically, this type of work was carried out under test and development (T&D) licenses which were able to be renewed annually without requiring repeated frequency co-ordination. This permitted industry to make the necessary investment believing that there was a degree of stability.

In 2002, the RA changed the manner in which T&D licenses were processed, changed the name and changed the licence period.

These changes were unexpected and have unsettled that part of industry who use T&D licenses.

There is a continuing need for access to spectrum for specific research and manufacturing businesses where their usage of spectrum is not specific to the UK spectrum plan. Most companies will aim to carry out the testing in suppressed radiation conditions to isolate their testing from the general environment. Others can not due to the risk of fire, the separation distance at which the tests must take place (laws of physics), the size of the suppressed radiation facility required, etc.

In these cases, the companies need to know that they can make investment in the external test facilities. They need to be sure that they can continue to obtain T&D licenses for the duration of the work [sometimes many years] and contract to supply such equipment.

Spectrum Trading and the consultation surrounding it seem to be ignoring this part of industry. Their requirements should be included in the Spectrum Framework Review (or other consultation).

Promised consultation on **LICENCE EXEMPTION FOR NON-OPERATIONAL USE OF WIRELESS TELEGRAPHY EQUIPMENT UNDER SUPPRESSED RADIATION CONDITIONS** has faltered or dropped out of site since the RA document of July 2003.

Spectrum Trading leaves uncertainty how to access spectrum that has been "sold" to a business interest can be assured for test and development purposes.

Recent changes in other areas of spectrum use - in particular the semi-privatisation of the National Air Traffic Service - has reduced confidence of Radar Manufacturers such that, I

believe, the radar was shipped to Australia to conduct the customer acceptance tests. In the future, UK jobs may be at risk if the issues are not seen to be resolved.

The problem is larger than would first be apparent from T&D license applications. The previous use of spectrum and its policing have led some companies to believe that their activities do not require RA / Ofcom licenses. Primarily, the Wireless Telegraphy Act 1949 is not seen to apply to wide spectrum, relatively low power, radiated testing, as it is not seen as Telegraphy or Communications. The lack of significant interference (for interference would have led to policing) may provide a pointer for future granting of long term licenses. However, the increase in spectrum usage and the protection levels granted to spectrum holders under spectrum trading terms and conditions, may lead to an increased detection of such test and development use.

I would welcome a meeting of interested parties in this field of work to discuss industries needs and provide information regarding the future of such test and development in the UK.