

Q1: Are there any other major medium- to long-term spectrum management issues that this review should be considering? Are there any other significant technological or market developments that this review should be aware of when developing its thinking?

- Having read the document my view is that the review is long overdue and that the short term issues that are being considered cover a good percentage of the current issues, my concern is that Ofcom do not back themselves into a corner by releasing too much control without having seen the affects of small shifts first, the cases sighted through out the document are for areas and counties that do not share the unique environment of the UK in previous tight regulation and in population density of spectrum users.

Q2: Do you believe it is useful to publish a compendium of issues? How frequently should it be published? What information should be included?

- In this case and whilst change in on going I believe more information is good and that information should be made available as appropriate, this time scale really depends on the rate of change to the issues under discussion.

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

- While I believe most issues are covered I would like to see more consideration for the scientific community and for that of Amateur radio, it is these areas that historically drive the innovation that the report concludes is vital to the self-management of the spectrum. Of particular mention is the idea of "Temporary" licences and lease licences to see if a service will be viable

Q4: Are there important lessons to be learnt from experience in other countries that is not addressed here?

- The US market has for years been a good indicator of how Not to do shared services, Cellular services being a prime example – The US allowed several formats to be introduced at the same time each of which was incompatible with the other, this slowed rather than sped up adoption of the new technology. This is a good case for Some regulation remaining.

Q5: Do you agree with Ofcom's intent to maximise the use of trading and liberalisation?

- Again, as long as there is a mechanism to oversee the process, total liberalisation for the sake of it should be avoided.

Q6: Are there other areas, apart from those identified above, where trading and liberalisation should be restricted? Are there areas identified above where you believe the trading and liberalisation could be fully implemented?

- As a base principle I am not in favour of unrestricted liberalisation, there has to be a voice of reason somewhere in the process that makes the people concerned think about the long term goals and not just the short term gain.

Q7: Do you agree with Ofcom's approach to providing spectrum for licence-exempt use?

- In principle yes, but controls Must be in place to make sure the rules are adhered too, We don't want to see grey imports of RF devices that "Almost" comply to the regulations and that are just off frequency or just over the power limit, this would be disastrous for any scheme of this type and would discredit what could be a good idea.

Q8: Is Ofcom's proposed methodology to estimate the amount of spectrum provided for licence-exempt use likely to deliver the right results?

- While I think the paper identifies the main issues I believe that the negative's should be fully addressed, for any of these schemes to work everyone must comply to the same standards,

any deviation would be detrimental to compliant users and again would discredit any positives that a scheme like this would bring – my question to the committee would be “is the technology in place to really make these schemes happen?” unfortunately I believe that at this time the answer is “no” on a technical front and “no” on a spectrum policing front. Licence exempt should mean exactly that and not regulation exempt, identification of free spectrum space should be done with the most cautious approach possible.

Q9: What is the appropriate timing and frequency bands for making available any additional spectrum needed for licence-exempt use?

- As the technology to police the changes is available then the changes should also be made available.

Q10: Do you agree with Ofcom’s longer-term proposals for spectrum trading?

- Again, as long as the technical limits are set out and adhered too I believe this system would be beneficial, if however the system is allowed to “self-regulate” I think there will be conflict and Ofcom will end up trying to police in retrospect rather than leading from the front.

Q11: Is the approach set out here, and in Annex H, for developing technology-neutral spectrum usage rights appropriate? Are there alternatives?

- The idea of “defining technology-neutral rights” is good but again limits and regulation has to have it’s place – does the paper go into enough detail on how to resolve co-channel interference if for instance User A and User B buy rights to adjacent spectrum, User A has a data feed and User B a voice feed, both interfere with the other ? – who has the right to peaceful existence and who resolves the conflict if the spectrum owner/manager can’t / won’t ?

Q12: Should Ofcom do more to resolve interference?

- With a more open spectrum management policy, Ofcom would have to take a more proactive roll in conflict resolution or regulation and in the policing of the spectrum to combat interference, if it does not there will be more issues like that of the Pager problems seen in the UK where the frequency allocated, coupled with the sloppy implementation by the companies concerned to this day causes interference with a host of services including Weather Satellite systems, the 2m Amateur bands, PMR + all services in and around this area – this can not be allowed to happen again and is as much a problem of policy as that of policing..

Q13: To what extent should Ofcom intervene in promoting innovation?

- Ofcom should be at the forefront of promoting innovation with policies that actively support it, the ideas of spectrum leasing, time limited spectrum usage and more specific help for R&D should be promoted and encouraged.

Q14: Do you agree with Ofcom’s proposed approach to harmonisation?

- Ofcom need to promote Harmonisation especially with in the EU as with the ability of current receivers it is possible for a service Many miles away to cause interference to another device even at very low powers – Radio amateurs have proven on several occasions that powers as low as 1mw can be received on different continents if the conditions are right, harmonisation can limit the affects of cross type interference and also allows better roaming support for like devices, this has to be at the heart of any spectrum policy.

Q15: Can you foresee any problems with the proposed approach to harmonisation other than those listed above?

- I believe harmonisation is a good thing as long as Ofcom remains active in the regulation of such, if harmonisation is to work, Ofcom must be at the heart of the process and must be proactive in discussions with all other bodies involved.

Q16: Do you agree with Ofcom's proposal to continue with division by frequency as the primary method of dividing the spectrum?

- At this time I see no alternative, Licensing Within a frequency could be split further but Frequency is still the only driver that can be used effectively even with UWB technologies.

Q17: Is Ofcom's approach of not Intervening to mandate entitlements in time appropriate?

- At this time, Yes. Ofcom should concenter secondary conditions within allocations that allow for time multiplex etc but should not intervene to enforce this.

Q18: Do you agree with the RIA?

- Overall I believe there is need for review. My main concern is that Ofcom look at all areas including spending time on the negatives and that adequate safe guards are put in place to police new licensing schemes. The de-regulation of large areas of the spectrum could be a great positive for the UK but it could also be a total disaster if Ofcom fail to protect the basic principles of frequency use and non-interference of adjacent services.

Notes:

Annex I – this method of check frequency usage has a few floors which are not mentioned in the Annex, the main one being the use of specific frequencies which may be shown as unoccupied may be restricted to specific times of the week or month.

Allocating a new PMR channel based on it's non-usage for a 24 hour period would not be acceptable as chances are the channel may be used at weekends or for event policing / organisation. I hope this is just an example or an average day and not the basis for discussion for free frequencies

Annex H - The point in H3 about Power output is a valid and good point, how many of the GSM transmitters would pass this test ?!