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WiMedia response to OFCOM on
the proposed Statutory Instrument, The Wireless Telegraphy (Ultra-Wideband
Equipment) (Exemption) Regulations 2007

WiMedia® is the only standards approved radio platform for ultra-wideband (UWB) wireless networking. With efficient power consumption and high data rates, WiMedia UWB has been selected by the Bluetooth SIG and the USB Implementers Forum as the foundation radio of their high-speed wireless specifications for use in next generation consumer electronics, mobile and computer applications. Over 200 international member corporations and research institutions support the non-profit WiMedia Alliance, developing specifications, certification tests, and educational programs. The WiMedia PHY, MAC, and MAC-PHY Interface specifications have been ratified by ECMA and ISO/IEC.

The WiMedia Alliance commends OFCOM for its progressive thinking and diligent work throughout the development of the technical proposals in TG3 and for their contributions to assure the EC decision offered manufacturers a workable legal framework for the development of UWB devices and access to the European marketplace.

With many of the WiMedia Alliance members actively preparing products and OEM devices for the European market, OFCOM's lead in the implementation of the EC decision of 21/02/07 will ensure that British industry and consumers benefit from this innovative technology at the earliest opportunity.

The WiMedia Alliance notes that this regulation covers the 'phased approach' period until 31/12/2010. The WiMedia Alliance is actively investigating measures which will improve spectrum capacity, management and co-existence for the benefit of all spectrum users beyond the phased approach and looks forward to a continued strong working relationship with OFCOM and other European administrations.

The WiMedia Alliance offers the following comment concerning the proposed regulation.

Interpretation

The draft regulation contains a definition of to be used in the assessment of peak power measurements and specifies a correction factor of $20\log(50/x)$ db where bandwidths other than 50MHz have been used for measurement. Whilst WiMedia appreciates that the format of this correction is drawn from Article 2 of the EC decision, we would draw OFCOM's attention to the fact that such a correction is valid only for UWB technologies that are pulse based. The technology used in WiMedia Alliance products is Orthogonal Frequency Division Multiplexing (OFDM) modulation which is Gaussian noise like in nature(1). Consequently a correction

based on $10\log(50/x)$ would be a more appropriate in this case. This technology distinction has been recognized by the ETSI and provision has been made in the draft EN for both classes of UWB devices to assure fair product assessment as a prerequisite to market access.

The WiMedia Alliance suggests that either this distinction of different classes of devices is reflected in the regulation or that the reference to correction factors in the Interpretation is removed and the relevant measurement criteria is taken from the ETSI standard(2).

The WiMedia Alliance would also draw OFCOM's attention to recent developments in CEPT TG3. The WiMedia Alliance understands that CEPT TG3 has recently approved raising the out-of-band emissions limits from -85 dBm/MHz below 3.8 GHz to -80 dBm/MHz. We hope this will be reflected in the next EC decision, and we would encourage the UK to act quickly to amend their regulations as soon as possible thereafter.

(1) IEEE 802.15-05-262r0

(2) Draft ETSI EN302065 v1.1.1 (2007-03)