

Lucent Technologies
Bell Labs Innovations



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Laurence Green
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Dear Mr. Green,

Lucent Technologies appreciates having the opportunity to comment on Professor Cave's "Review of Radio Spectrum Management" dated March 2002.

As a designer and manufacturer of state-of-the-art wireless communications solutions, Lucent Technologies is acutely aware of the importance of the issues that the Cave report addresses.

In general, Lucent endorses the over-all direction and recommendations of the Cave report. We believe Professor Cave has charted a useful way forward in dealing with complex issues of spectrum management and technological change in the context of a variety of important policy concerns.

Lucent broadly supports the comments submitted by the FEI, of which it is a member. However, Lucent feels that it is important separately to note that we would have significant concerns about any spectrum management plan that linked spectrum allocation to particular types of systems or that did not contain enough flexibility for spectrum users to respond to technological change, which can often be rapid and offer dramatically enhanced services, increased spectral efficiency and concomitant benefits to operators, manufacturers and end users, and thus the economy at large. In this regard, Lucent would also specifically endorse Professor Cave's recommendations to introduce spectrum trading for all commercial spectrum users and to minimise the conditions imposed in licenses on such use so that spectrum users have full flexibility to deploy the best wireless solutions available to maximise economic and technical efficiency in the interest of UK society as a whole. In this context, Lucent agrees with Professor Cave that any use within the ITU-

specified service categories should be allowed and that it would be sufficient to impose interference limits on spectrum users to avoid harmful interference to other users that might otherwise occur.

Respectfully submitted,

Charles Mathias

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