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Broadband Fixed Wireless Access (BFWA) at 28 GHz: proposals to amend new and existing licences and for the next stage of the award process. October 2002

Broadband Wireless Association Response

Q.1 Do you agree that the “purpose of use” clause should be removed from existing and future 28 GHz licences?

The BWA welcomes any move to reduce unnecessary constraints on potential wireless access licence holders in the 28GHz band.

However the BWA suggests that care should be exercised if considering complete removal of the "purpose of use" clause. The emphasis on access applications as the key spectrum use objective and the provision of broadband services should remain prioritised.

Removing the constraints on connection to "other telecommunications networks" opens the opportunity for 28GHz wireless access operators to provide not only access to customers directly but to utilise capacity to support other networks and technologies as well.

Q.2 Do you agree that the “use it or lose it” clause should be removed from existing and future 28 GHz licences?

Yes. However, measures should remain to ensure that best use is made of the spectrum to ensure it's assignment continues to facilitate competitive provision of access services.

Q.3 Do you agree that the minimum path length policy should apply where a licensee provides point-to-point links to other operators?

The BWA has no comment on the detail path length policy itself and is unclear why this provision is required. A minimum path length policy is implemented

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by the RA to encourage applicants for P-P Fixed Links to consider frequency bands most appropriate to their specific hop length requirements. It seems to suggest some concern within the RA that this 28GHz band could be viewed as a competitor to the RA Fixed Link assignment procedures. The BWA is similarly concerned as the provision of access services should remain the primary licensing objective. The assignment of Fixed Links in the band as individual protected entities would quickly block spectrum access for other systems more appropriate for wide scale service coverage.

Q.4 Should the government consider making any other changes to the licences and, if so, for what reasons?

Yes.

As mentioned earlier the BWA represents manufacturers and operators who have interests in a range of wireless access systems. These operate in various frequency bands under various regulatory regimes. As circumstances in the telecommunications market have changed over recent years it has become apparent that no single wireless (or wired) solution can provide the complete answer to the provision of broadband services in all areas. This message has been a key input to the (near) published report of the Broadband Stakeholders Group that has included contributions from the BWA amongst others. The 28GHz licensing arrangements and award procedure seem isolated from other developments and make it difficult for potential operators to see how they can practically make use of this spectrum in conjunction with developments in other frequency bands. This coupled with the low financial confidence of investors in telecommunications networks at present, have combined to stall the licensing process and hence access to the spectrum itself.

Therefore the BWA encourages the RA to consider more imaginative methods of licence packaging and assignment procedure that could help break this deadlock.

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