

Ademco Microtech Limited

The Questions asked by RA are as follows :

1. What are the potential gains and benefits to the UK of allowing commercial services in the licence exempt bands, in terms of new innovative services (business models), promoting competition , and making Britain the best place to do e - business.

I am sure that the commercial services could offer huge gains.
Unfortunately the losses suffered by smaller companies would probably outweigh the gains of commercial services.

2. Will the introduction of public telecom services into existing licence exempt bands result in unacceptable levels of interference to existing users, and if so , in what geographic locations might this be expected.

Yes. Most geographic locations would be affected. Evidence of this is best demonstrated by the problems encountered with the 433MHz band.

3. Would the introduction of public telecom services, into existing licence exempt bands , result in congestion of those bands.

Yes. It is all well and good having bands with low duty cycles, but if These bands have say 100 times more equipment in them, then congestion of the band will result.

4. in bands where channel access techniques have been identified for specific services, will these techniques be sufficient to avoid future congestion? If not, please give information about other techniques that might be applicable.

Again it does not matter what technique is used, if the amount of equipment operating in the band increases significantly then congestion of the band will result.

5 What type of public telecom service could be offered in licence exempt spectrum and what is the anticipated market demand ?

6 Assuming that there would be a lower quality of service available from public telecom services using licence exempt spectrum, compared to those using licensed spectrum, how could potential end users be informed of this?

Commercial telecoms services have to state their level of guaranteed service.

7. Which, if any, frequency bands (, ie 433 , 868 , 2.4 Ghz , etc) are NOT suitable for the introduction of public services and why?

433MHz, 868MHz, 2.4GHz, 10GHz. The first band already suffers from congestion, and a lot of manufacturers are moving to the 868MHz band to alleviate this problem. The other two bands would possibly suffer due to the type of equipment used within the bands, ie Microwave detectors. These devices have to be fairly low power, and if higher power devices are allowed into the band, then these types of device may not then be able to operate in the bands. This would have a detrimental effect on the sale of these devices.

8. Are there any potential problems associated with allowing commercial services in licence exempt bands?

Commercial services are not known for their concern for smaller companies, as long as their own market and profits are increased. I do not think these bands are suitable without strict regulation. There are enough problems within these bands without the substantial increase of equipment that would result from commercial services having access to the bands.

9. Assuming that public telecom services are permitted in licence exempt spectrum, what would be considered suitable time scales for making these changes in each of the bands?

Having just changed to the 868MHz band, at considerable expense, no time scale would be suitable for this band. We would strongly resist any changes to this band. If it is the intention of the RA to chop and change every few years, then the effect on the industry as a whole would be disastrous. Most small companies could not afford to continually redevelop product every few years, and consumers would not be happy to have to upgrade their equipment every few years. The Legacy of equipment already in these bands is very large.

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