

Response by Digital Matrix Cymru to the Radiocommunications Agency Consultation Document: Use of Licence-Exempt Spectrum For Provision of Public Telecommunication Services (October 2001)

The following response to the Radiocommunications Agency consultation *Use of Licence-Exempt Spectrum For Provision of Public Telecommunication Services* is made by Digital Matrix Cymru, a Welsh campaign for Broadband and New Media development.

This submission affirms the principle of no-licence use for public and small business access to shared use of the radio spectrum. We see wireless as a broadband solution especially appropriate to remote and rural areas, such as large parts of Wales.

Digital Matrix Cymru www.digitalmatrixcymru.org.uk was set up in October 2001 as an open platform to campaign for a Broadband Wales and a Welsh New Media Industry.

In November 2001 Digital Matrix held a conference in Aberaeron, West Wales, with 106 delegates attending. The conference brought together a wide range of people - including small media companies, the public sector, academics, students, small businesses, the regional development agency, a telecoms company, the Welsh Consumer Council, private investors- and highlighted a constituency of interest for campaigning for a Broadband Wales. The location for the conference was symbolic of the challenge of broadband for remote and rural areas such as west Wales. A full report back on the conference is available on the Digital Matrix website.

A conference workshop session "Broadband Politics and Legal" endorsed a submission to the current review of licence exempt spectrum. Workshop participants included people engaged in ICT development in the public sector - two rural county councils, the Welsh Development Agency and the Mid Wales Partnership. The consensus view was formed that no-license use of radio spectrum for both the 2.4GHz and 5.8 GHz bands would be a vital means of addressing "digital divide" issues and promoting regional economic development, particularly for rural Wales and the SMEs small to medium enterprises agenda.

The conference highlighted both problems and solutions of broadband connectivity in Wales. A wireless demonstration linking the conference hotel venue to a church tower some 600m away in the town of Aberaeron was given by Ambinet of Powys. A video "Wales' Digital Opportunity" presented the wireless vision for Wales of US telecommunications pioneer Dave Hughes of Colorado. This video may be viewed as a webstream on the Digital Matrix website www.digitalmatrixcymru.org.uk We affirm the community wireless networks model that is elaborated here, the argument for a healthy mix in the telecoms marketplace to

promote the public interest for citizens' access and small business use of no licence spectrum, and the need for spectrum management policy to reflect advances in digital radio communications for shared spectrum use.

The success of the Digital Matrix Aberaeron conference has led to further engagements in the public policy process and media sector advocacy. For example, Digital Matrix has participated in the National Assembly For Wales "Ubiquitous Broadband Infrastructure for Wales" policy workshops, the report from which is currently before ministers for approval of a costed implementation plan. A consensus view was formed in the workshops to define "local initiatives" as a significant action area, with specific reference to no-licence use of wireless and the challenge of bandwidth in rural areas. Digital Matrix is currently participating in the Wales Broadband Private Sector Stakeholders Committee.

Digital Matrix assumes a technology neutral stance- ADSL, wireless, satellite, fiber, or whatever mix, all are means towards the end of bandwidth and creative content production. Digital Matrix continues to promote wireless as a breakthrough technology ideally suited to the problems of "remote and rural areas" such as Wales: a "last mile" (or community "first mile") solution, affordable and rapidly deployable, offering a lifeline to smaller communities, individuals and SME small to medium enterprises. This is especially the case for the independent media sector, which can compete globally once bandwidth access and affordability are no longer an issue. The agenda is an urgent one, for the challenge for new media producers is to produce right now on a digital platform, to harness the talent that exists, and to exploit niche market potential for product in the new global digital marketplace. Catch-up is simply not an option.

The DMC website www.digitalmatrixcymru.org.uk includes webstream of a wireless ISP called Interlink, in Keokuk, rural Iowa. Interlink Vice President George Walden is clear about rural telecoms issues, and views developments in rural Wales with interest:

We saw the need for wireless in rural Iowa (problems of incumbent telco, DSL rollout failure, etc) to bring *affordable broadband* to areas that the telco and cable companies would never go. Success followed. We were pleased to host a Welsh delegation in May 2001 and really hope that spectrum rules in the UK are changed to allow no-licence use of wireless internet. Empower the rural areas, small businesses, citizens and consumers as opposed to empowering the telcos.

The commercial success of Interlink demonstrates the viability of wireless as a means of affordable broadband connectivity across the full range of community needs from small business to local public services and household use, and this in a rural area hitherto dominated by talk of "the digital divide". We especially note the case of the local architect, for whom affordable bandwidth means that he is

now in an ideal location, in his rural home community, to compete at both state and global levels.

The pre-condition to such wireless deployment in the United States is of course the existence of a positive regulatory regime. We affirm the public interest principle of no licence use on particular bands – 2.4 and 5.8 GHz- to enable active participation in the opportunities of the new digital economy. Technical expertise on digital radio communications is beyond us, but we urge government and policy makers to follow the precedent of countries such as the United States and Scandinavia to set in place effective rules with adequate technical specifications to allow deployment of wireless technologies for a competitive telecoms marketplace to deliver affordable broadband to the citizen, consumer and small business.

Submitted on behalf of the Digital Matrix Cymru community of interest
www.digitalmatrixcymru.org.uk

Neil Davies, Dai4Films

John Wilson, Digital Consultant

15 February 2002