

To: Mrs. Sallyanne Miller
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Voice of UK
Electronics

From: Graham MacDonald
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**Subject: Use of Licence-Exempt Spectrum For Provision of
Public Telecommunication Services - FEI Response**

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Dear Mrs Miller,

FEI welcomes the opportunity to respond to the consultation on the "Use of Licence-Exempt Spectrum For Provision of Public Telecommunication Services".

FEI Response:

The FEI represents members from a broad range of telecommunication sectors including manufacturers and operators. Whilst generally the FEI membership welcomes the opportunity to make use of licence-exempt spectrum to increase access to telecommunications services for the mutual benefit of consumers, the telecommunications industry and the UK, it has been difficult to reflect the complete range of views precisely in responses to the specific questions in the consultation document.

FEI recommend the RA take into account European developments in this area to avoid a UK-specific solution. Additionally the FEI suggests that to expedite take up and availability of services, the RA should consider frequency bands where equipment is more readily available.

However some members of the FEI are concerned regarding a number of aspects of the proposals put forward in the consultation.

Firstly, there is some concern that the new services might be mistakenly seen as an alternative to UMTS / licensed Fixed Wireless Access and recommends that the complementary nature of the opportunities for commercial licence-exempt services in relation to licensed services (and technologies) is made very clear and publicised to avoid doubt and confusion in the minds of potential telecommunications operators and investors.

Secondly, noting that the use of license-exempt frequency band for commercial services will be on a non-protected basis the FEI believe that it is the responsibility of the Operators to provide information to their customers relating to "quality of service". It is the Operators responsibility to provide a minimum acceptable quality of service level but market forces will determine if this level is adequate. FEI believe care should be taken that any "quality of service" issues are not

perceived by Operators or end-users in a way that could degrade the reputation of licensed wireless systems as an appropriate and robust means of telecommunication service delivery.

FEI understands that equipment which is self-protecting and polite in operation is just one of a number of additional measures that could go some way to address the difficulty of ensuring an interference free environment and avoiding congestion. FEI believe it is important that these measures are properly studied and can be implemented through appropriate UK Interface Requirements for particular frequency bands where they are not already identified in the recognised international standards in the current Conditions of Use.

FEI are also concerned that the providers of “Innovative services” may not necessarily feel confident to release details of their business case to the RA to assist in justifying access to these bands. If information is provided in confidence to the RA, FEI do not recommend the RA base recommendations on information provided in confidence since this is not open and transparent.

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