

October 4th 2002

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Paul Redwin
Licensing Policy Unit
Radiocommunications Agency
10B/20B Wyndham House
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Dear Mr Redwin,

**SUBJECT: FINAL PROPOSALS ON THE PROPOSED CONSOLIDATED
WIRELESS TELEGRAPHY LICENCE-EXEMPTION REGULATION**

UK Broadband Limited welcomes the opportunity to comment on the proposals mentioned above.

By way of introduction, UK Broadband is a Wireless Internet Service Provider and Network Operator offering Wireless Leased Line and Wireless broadband services to businesses, public organisations and professional tele-workers.

UK Broadband fully supports the proposal to allow both public and private services to operate on a licence exempt basis in the frequency bands:

- 5150 - 5350 MHz (Band A: indoor use only);
- 5470 - 5725 MHz (Band B: indoor and outdoor use).
- 57.1 – 58.9 GHz (for fixed terrestrial point-to-point links)

However, UK Broadband has built a business plan around the cost-effective delivery of high-speed Internet access using unlicensed spectrum in 5GHz band C (5.725GHz to 5.875GHz). The use of this band for public services has been ratified in territories such as Asia, other parts of Europe, and the USA. Should the use of this band for public services in the UK continue to be restricted we believe the benefits of these global economies of scale will be lost to UK users.

We are strongly in favour of extending the proposals to include permitting public telecommunications services in band C without a WT licence, but with base station registration. We appreciate the need for further research to fully quantify co-existence issues with other spectrum users. In the meantime, we advocate that the temporary licensing process should be extended allowing commercial operations to begin delivery of point-to-multipoint Broadband Fixed Wireless Access services immediately.

We believe the final decision on temporary use licenses for Band C must be made by the end of November 2002 and that a final decision be made early in 2003 such that 2003 can be a year of accelerated deployment for network operators such as ourselves.

Yours Sincerely,

Paul Archer

CEO,

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