

THE WIRELESS MESSAGING ASSOCIATION RESPONSE TO RA CONSULTATION DOCUMENT "THE FUTURE USE OF THE 169 MHz BAND" MAY 2002

1. Introduction

This document is the response of the Wireless Messaging Association (WMA) to the Consultation Document "The future use of the 169 MHz band" dated May 2002. Contained in this document are the collective views of the WMA. Members of the Association may choose to respond to the Consultation Paper in their own right or on behalf of their company.

The structure of this response is to provide answers using the same numbering as in the consultation document.

5.1 Comments and views on all aspects of this consultation are invited from interested parties. In particular:

- i) The Government believes pan-European paging will not develop in this band and that there is sufficient spectrum for paging in other bands. The Government therefore seeks views on the suitability of the 169MHz band for services other than paging.

The WMA agrees with the Government. The period of growth in Public Wide Area Paging has now passed and there is now little growth.

- ii) Any suggested re-use for the 169MHz spectrum may take into account that the band is currently allocated for a high power application (400W). Candidate replacement applications may similarly be high power alternatives. This being the case, a previously negotiated agreement whereby adjacent band services are protected from interference would still be valid and new entrants may be required to pay for site engineering costs to reduce any interference to within agreed limits. The current allocation for high power usage does not exclude consideration of low power alternatives.

The WMA agrees with the Government. However, we would like to remind the RA that the frequency plan for ERMES was relatively complex and relied on country allocations of channels. This made the equipment quite complex and expensive. It was also not an efficient way to utilise the available spectrum. We would suggest that new services should be selected that do not rely on such frequency allocations. The WMA is happy for new services to use high or low power applications.

- iii) A pan-European harmonised allocation is desirable given the benefits resulting from harmonised spectrum use.

The WMA totally agrees with this statement. Every effort should be made to maintain the harmonised spectrum. National solutions should not be an option if any credible suggestions for pan European use of these channels are proposed.

- iv) National solutions, rather than those agreed through CEPT, should not be detrimental to Community measures that facilitate a single market.

The WMA totally agrees with this statement. Every effort should be made to maintain the harmonised spectrum. If national solutions are adopted they should not be allowed to interfere with harmonised uses.

- v) The Government seeks views on the foreseen demand for additional spectrum and the suitability of using the 169 MHz band for the alternative services listed below. The Government is also interested in receiving suggestions for other services that may be appropriate for the 169 MHz band.

WMA members have no need for the spectrum reserved for ERMES even though it is now technology transparent. The spectrum our members have at the moment is enough for the foreseeable future. Should there be a need for more spectrum in the future we believe that we should be offered non harmonised channels

- vi) Given the Government's preference to maintain spectrum allocation for a harmonised pan-European service the Government seeks views and comments from industry on the need for harmonised allocations for the proposed alternative services.

The WMA has no comment to make on the proposed alternative services.