

Auriga Communications Ltd
95 Ditchling Road
Brighton
BN1 4ST

Tel: (01273) 571238

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Dear Sir,

Spectrum Pricing: Year five – A consultation document.

Auriga Communications have been supplying digital dispatch systems to Taxi companies for a number of years. Our customers' systems make intensive use of data transmissions over PMR channels, and as a result we have a great interest in any changes to the licensing regime.

We were active participants in the working group that initially defined IR2008. A number of problems were recognized with MPT1379, and we saw its replacement by IR2008 as a positive step.

However, paragraph 5.12 of the consultation document has caused us some concern. It suggests that operators who desire more than 2 time-slots will be unable to obtain a suitable license. There are two main issues here.

Firstly, it is not clear whether these two slots are a single pair of one base Tx and one mobile Tx slot, or two of each.

Secondly, our experience suggests that *most* taxi operators using data transmission will require more bandwidth than is available in two (pairs of) time-slots. We estimate that the limit will be reached with a fleet size of between 30 and 100 vehicles – the exact limit depending greatly on the types of data services being used.

More recent correspondence has indicated that the Agency may relax this 'two slot' restriction – that base Tx and mobile Tx slots may be allocated independently, and that allocations of more than four slots will be considered on a case-by-case basis.

This seems to be more flexible, although there is no indication of the criteria that would be used when considering applications for more than four slots.

This approach does, in turn, raise more questions. If a license application asks for six slots, would those slots be allocated in a single channel? If an operator holds a license for 2 slots, and applies for two more, would they be on the same channel?

In summary, Auriga Communications welcome the introduction IR2008, regarding it as a significant improvement over MPT1379.

However, the limitations that seem to be implied by section 5.12 could presents severe obstacles to our business, and that of our customers.

We would much prefer the introduction of the more flexible scheme that has been suggested recently. We would additionally like to see some clarification of issues mentioned above. In particular, we would like to know more about the criteria for assessing applications for more than four slots.

I hope that this response has been helpful to you.

Yours sincerely,

Philip Dixon
Auriga Communications Ltd.

<mailto:phil.dixon@auriga.co.uk>