

**Band Alignment Project team
Radiocommunication Agency
11G/6D
Wyndham house
189 Marsh Wall
LONDON E14 9SX**

Newport, 9th April 2003

Dear Sir,

450-470 MHZ Band Alignment Consultation Document

We are pleased to respond to the Radiocommunications Agency (RA) 450-470mhz consultation document, which covers the re-planning project by which the RA will manage the alignment of this band to the configuration quoted in the European Common Allocations (ECA) Table.

We understand that the RA is planning to start this project at the end of 2005 and complete it within 5 years. This is likely to produce in the region of another 7 MHZ allocation in the band.

As a manufacturer of UHF PMR equipment based upon the TETRAPOL publicly available standard which covers the frequency range 380 – 490 MHZ we appreciate that eventually there will be additional spectrum for our potential customers to use our equipment. From a technical perspective it falls into our existing spectrum range, and therefore does not present any problems. Even using CEPT reversed alignment as will probably be the case in UHF1 technically is not a problem. There will, however, be a cost impact if we have to retune base station site equipment to meet the reversed alignment.

Although we appreciate the efforts by the RA to re-plan this spectrum we have a number of concerns. The projected timescales will delay our ability to compete in this spectrum for circa 5 years. There are also the issues facing existing users in this band, as you have highlighted in your document.

The main impact to us as a manufacturer however, is the inability to compete in this market place without the availability of spectrum. We are already facing this in UHF1 where there is no national spectrum available other than that already allocated to the Airwave project. This impacts not only on us competing in national projects such as the Ambulance Radio Replacement Programme and Firelink., but contributing to the economy by creating jobs and expertise within the UK.

We remain committed to supporting the RA in its efforts to creating a competitive environment in the UK but also wonder what impact there will be on the marketplace once the RA ceases to be a government department and is subsumed into Ofcom.

Yours faithfully
For and behalf of Cogent.

Philippe Meleard
Director Public Safety
EADS Telecom UK