

Mr Steve Green

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11th August 2011

Dear Steve,

Consultation and information on technical licence conditions for 800 MHz and 2.6 GHz spectrum and related matters

Thank you for the opportunity to comment on this further consultation on the 800 MHz / 2.6 GHz spectrum award as issued on 2nd June 2011. Rather than addressing the consultation questions directly, NATS has a number of comments as follows.

Section 5.8 discusses permanent co-ordination requirements and NATS would welcome the opportunity to discuss these further with Ofcom noting the indication that the details have yet to be developed and that stakeholder workshops are planned to be held. NATS notes at this point that an example propagation model is quoted (ITU-R P.452, 0.01% time) for use in assessing a case by case co-ordination requirement and would wish to understand the justification behind this level of time percentage being used for assessing interference into radar systems.

NATS notes in section 5.8 that Ofcom is considering the potential for and mitigation of interference to S band radar systems from 2.6 GHz terminal stations and would wish to understand Ofcom's thoughts on this point at an early stage.

Throughout the consultation document and the supporting Real Wireless Studies document dated 31st May 2011, the effects of the baseline -45dBm/MHz EIRP base station unwanted emission limit are considered along with those of an example more stringent level of -65 dBm/MHz for low power base stations. We are aware that UWB and other so called "underlay" technologies exist and may now or in the future be in unco-ordinated use in bands such as 2700 – 3100 MHz. It isn't clear how or whether the cumulative effects of such additional in-band (to the radar) systems have been taken into account in assessing the adequacy of the -45dBm/MHz EIRP unwanted emission level for the protection of radar systems.

NATS also notes the document "Airport Deployment Study" from Real Wireless, Ref MC/045, that we believe appeared on the Ofcom website at some point during late July or early August. This is a substantial report that deals with technical issues similar to those covered in the 2nd June consultation document and we are still analysing it, although any mechanism for commenting isn't clear. At this stage however, noting some of the comments in that report NATS would reiterate the point that we and others operate S band radar systems that are not located at airports and would also observe that systems located at an airport are not necessarily owned or operated by the airport operator.

Yours sincerely,

Steve Mitchell

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NATS

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