



OFCOM CONSULTATION: WHITE SPACE DEVICE REQUIREMENTS

SKY'S RESPONSE

1. This submission constitutes the response of British Sky Broadcasting plc (Sky) to Ofcom's consultation on white space device requirements dated 22 November 2012.
2. In general, Sky welcomes the progress that Ofcom has made in preparing to implement the regulatory regime required for the introduction of white space communications into the UK. This consultation represents another important milestone on that path of progress.
3. Sky would like to associate its individual response with responses from 2 other groups with which Sky has collaborated:-
 - (a) An industry group consisting of Adaptrum, Broadcom, CSR, Google, Microsoft, Neul, Sky and Spectrum Bridge: This response provides detailed analysis, comments and recommendations regarding the proposed device and database operation and we would encourage Ofcom to take careful note of the submission made by this group.
 - (b) The Digital TV Group (DTG): The response from this wide ranging and prominent industry group concludes that an *"end to end test must be performed before any implementation"*. Sky notes that the database concept was successfully tested during the Cambridge Consortium trial¹ but we think that it would be beneficial to carry out a more dynamic test and would add that the "end to end" scope should include some realistic interference trials.
4. Sky strongly believes that the introduction of white space communications will be of great benefit to the UK and it is important that the starting conditions are not unnecessarily onerous.
5. As a Programme Making and Special Events (PMSE) user and a Digital terrestrial television (DTT) broadcaster, Sky is very well placed to understand the need to provide adequate protection for licensed services. However, this should not lead to

¹ For more information regarding the Cambridge Consortium trial please go to:

<http://www.microsoft.com/presspass/emea/presscentre/pressreleases/April2012/24-04CambridgeTVWhiteSpacesConsortium.msp>

the provision of significant over-protection for certain groups based on the cascading of worst case protection elements, when it is clear that doing so would unnecessarily hinder the launch of this exciting, dynamic innovation.

6. Sky understands that there are some missing elements in Ofcom's knowledge bank, which are required to find an optimised level of licensed service protection. It is essential that these gaps are filled before the power level / interference protection regulations are finalised.

Sky

January 2013