

**Title:**

Mr

**Forename:**

Steve

**Surname:**

Gore-smith

**Representing:**

Organisation

**Organisation (if applicable):**

ITN Ltd

**Email:**

steve.gore-smith@itn.co.uk

**What additional details do you want to keep confidential?:**

No

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

ITN broadly agrees with OFCOMs assessment of 420-470.

I would like to make 2 points:

I would emphasise the extra pressure on the band from the move from 700 for PMSE.

PMSE needs the ability for continuous transmit that many of the newer shared spectrum solutions do not provide.

**Question 1: Do you agree with Aegis's conclusions on congestion of current use of 420-470 MHz spectrum? Are there any other signs or areas of congestion that Aegis have not identified from their review?:**

Broadly agree

**Question 2: Do you agree with Aegis's conclusions on the future demand and use of 420-470 MHz spectrum over the next ten years? Are there any other future uses or areas for future demand that Aegis have not identified from their review?:**

Broadly agree - would like to emphasise that PMSE will have more demand on 420-470 due to the move from 700

**Question 3: Do you agree with Aegis's conclusions that there is not yet any UK demand for wideband services in the 450-470 MHz band (which could for example, be used to improve rural mobile coverage)? Please provide any supporting evidence for your position.:**

This isn't my area, but from what I know, I would agree

**Question 4: Have you experienced degradation in your systems? performance which you consider to be caused by continental interference in the last 12 months? If yes, what approach did you take towards managing and minimising interference?**

**Please provide any supporting evidence which explains the frequency, impact, duration, time, location and cause (whether suspected or investigated) of the interference with respect to your specific sector(s).:**

None that could be attributed to continental interference

**Question 5: Is there additional information relevant to the configuration of the 420-470 MHz band that we should consider in developing our approach to its future management? Please provide any evidence to support your views.:**

No

**Question 6: Do you agree with the potential solutions Aegis have proposed for managing the 420-470 MHz band to both meet the continued growth in congestion and demand from incumbent spectrum users, and to facilitate the deployment of wideband technologies? Are there any other solutions which you consider we should examine that Aegis have not identified from their review?**

**Please provide any evidence to support your position and reference each solution in your response as appropriate.:**

Broadly agree - the band needs rationalising

**Question 7: Do you have any further comments relevant to how we might manage spectrum between 420-470 MHz? :**

No

**Question 8: Do you have any comments on our proposed programme of work, the outcomes from which we will use to inform future decisions on how we manage the 420-470 MHz band? Are there any additional areas you consider we should explore?:**

No