

Title:

Mr

Forename:

Peter

Surname:

Ecclesine

Representing:

Self

Organisation (if applicable):

Email:

peter83@mindspring.com

What do you want Ofcom to keep confidential?:

Keep nothing confidential

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

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Question 1: Do you have any comments on the application of the protection clause to all new licences for the 600 MHz band and geographic interleaved spectrum?:

Question 2: Do you have any comments on our approach to technical licence conditions for the 600 MHz band and geographic interleaved spectrum?:

Question 3: Do you have any evidence using frequency offsets with DVB-T2 EC signals might have an adverse impact on uses of adjacent interleaved spectrum?:

Question 4 Do you have any evidence mobile services using the 600 MHz band and geographic interleaved spectrum could cause harmful interference to cable television?:

Question 5: Do you have any comments on protecting PMSE in channel 38?:

Question 6: Do you have any comments on non-technical licence issues and the way we propose to approach them?:

Question 7: Do you have any comments on our assessment of the most likely uses of the 600 MHz band and geographic interleaved spectrum? Are there any potential uses we have not mentioned that should be considered?:

I think you have to give more consideration to utilities and emergency services, especially in Channel 69.

Question 8: Are there any distinctive considerations and uses for this spectrum in the nations and regions of the UK?:

Question 9: Do you have any comments on our continued inclusion of channel 36 in the award of the 600 MHz band?:

Question 10: Do you have any comments on our intention to maintain a market-led approach to awarding the 600 MHz band and geographic interleaved spectrum?:

The idea that you can quantify risk is built into the market-led approach, yet financial markets in the last two years give testimony to what happens when risk is undervalued:

http://www.businessweek.com/magazine/content/10_16/b4174038680087.htm

I suggest further intervention is warranted, or the rich spectrum holders (who can borrow in this environment) will just get richer.

"We talk about two broad types of innovation. There are innovations that sustain things that already exist: they make things better, they make business models stronger. Then there are innovations that disrupt what is there: they create markets that didn't exist or they transform markets that do exist by doing things fundamentally differently."

The risk of innovation is what you foreclose with a market-led approach to awarding the 600 MHz band, and I hope you list the innovations of the last three years (including 802.11n and 802.16e) that bear on the possible value of the 600 MHz spectrum.

Question 11: What information can you provide on packaging and award design considerations?:

Question 12: When would you like to start operating new services using the 600 MHz band and/or geographic interleaved spectrum?: