

Name withheld 2

Additional comments:

Question 1: Do you have any comment on the proposal to apply the limits defined in Case A of Commission Decision 2010/267/EU for out-of-block emissions from base stations into all frequencies in the range 470 to 790 MHz, as set out in Table 4.4?:

No

Question 2: Do you have any comment on the proposal to set an in-block emission limit of 61dBm/(5 MHz) for base stations in the 800 MHz band?:

As a producer of SRDs in the 868 to 870MHz area I am very concerned about the effect of high power signalling in adjacent frequencies. As SRDs are limited in ERP to 14dBm a large part of the performance of the product is obtained through high receiver sensitivity - typically down to -120dBm. This will make it susceptible to interference from outside sources and thus extra filtering has to be introduced, which then has the effect of reducing sensitivity. We produce fire alarm systems - performance and reliability are mission critical, as the requirements of the European standards (EN54-25) will testify. I feel that these frequencies should be protected from high output systems in order to ensure the pan-European application of these systems and to also protect the needs of the many SMEs working in the UK in these areas.

Question 3: Do you agree with the proposed conditions on antenna placement that would permit the use of the alternative block-edge mask for restricted unpaired blocks? If not, please explain your reasoning and your alternative proposals, bearing in mind the need to remain consistent with the framework provided in Commission Decision 2008/477/EC.:

No comment as we do not use this band

Question 4: Meeting the conditions on the use of the alternative block edge mask for restricted TDD blocks would require certain licensees to share information about the locations of their base stations. Do you agree with this proposed approach?:

No comment as we do not use this band

Question 5: We welcome comments on stakeholders' preference for the dedicated or hybrid options for low-power shared access as discussed above.:

No comment as we do not use this band

Question 6: We welcome comments on the appropriate frequency placement for low-power spectrum blocks.:

No comment as we do not use this band

Question 7: Do you agree with our proposed technical licence conditions for low-power access?:

No comment as we do not use this band

Question 8: We welcome comments from stakeholders on the additional restrictions and technical measures we have outlined for the management of interference under the hybrid approach, and the technical licence conditions that would be necessary to implement them.:

No comment as we do not use this band

Question 9: Do you agree that a Code of Practice on Engineering Coordination, as outlined, is the appropriate approach to manage the coexistence between low-power licensees?:

No comment as we do not use this band

Question 10: Do you agree that we should proceed with the approach that terminal stations complying with the relevant technical parameters be exempted from the requirement for individual licensing?:

I believe that provided they comply with the technical regulations and that their ERP is such that it does not affect other mission critical or life safety SRDs there is no reason to fore individual licensing.