

BAE Systems

Question 1:

Do you agree with our proposal to award the 3.4 GHz band in a way that is consistent with an unpaired (TDD-compatible) band plan only, and to make this decision sooner rather than later? If not, please set out your reasons and any evidence for your view.

Answer 1:

BAE Systems has a long established interest in land, maritime and airborne radar systems. We have a particular concern regarding the currently proposed TDD band plan and urge that greater caution and clarity is incorporated into the band plan, particularly at the CEPT level, to properly accommodate existing and potentially future radar use in the 3400-3410MHz band.

Since the Ofcom consultation opened, we note that CEPT-ECC are now formally consulting on the Revision to ECC/DEC(11)06, including the band plans for both FDD and TDD options and some of our comments refer to the detail in that.

The current Draft Decision includes 'considering's' for various radar use in the 3400-3410 MHz section – including airborne systems which are used in many UK/Nato areas and involve long-range protection requirements. Such systems will be present in, or affect, many countries regardless of whether TDD or FDD is utilised. Therefore there should be far greater consistency in both TDD and FDD band plans regarding 3400-3410MHz and any block edge mask at the 3410 MHz border for countries which will retain 3400-3410 for radar use (a provision which is missing in the TDD plan and related annexes).

Historically, Fixed Wireless Access and the proposed FDD band plan recognised the Radiolocation issue and excluded the 3400-3410 MHz sub-section entirely, greatly simplifying overlap/interference concerns. However the draft TDD plan does not. We are disappointed not to see greater consistency. We strongly encourage Ofcom to consider inputs to the CEPT decision making process that might include:-

- Excluding 3400-3410 MHz entirely in both TDD and FDD plans
- Restricting 3400-3410 MHz TDD to low-power / indoor use
- Adding a specific footnote to the TDD band plan that indicates 3400-3410 MHz may not be available in some countries and that precautions may be required at the 3410 band edge
- Add a mask requirement for wireless equipment to meet, should there be a 3410MHz band edge (Table-6 of the draft decision)
- Geo-location sensing mandated to ensure that roaming User Equipment is disabled from utilising 3400-3410MHz in affected countries
- Amend Annex-5 of the draft ECC decision to clarify radiolocation protection in the 3400-3410 MHz range

For example, maintaining the 3400-3410 radar 'guard band' by excluding it from (or significantly modifying) the TDD plan, would lead to greater clarity/harmonisation for all concerned and lower equipment costs, without causing any significant degradation of new wireless capacity.

If suitable precautions/clarity is incorporated, then we see no reason why the 3.4GHz band release should not be taken forward early, as there should be far less complexity involved in

band clearance in the >3410MHz range, compared to the system and equipment changes involved in the 2.3GHz band.

Questions 2-18:

No Comment