

Dear Ofcom,

I am writing in my capacity as director of High-Speed Universal Broadband Services C.I.C., (HUBS), a not for profit telecommunications provider that provides its members -- mostly small rural community networks -- with ISP aggregation services. We, through our members, are active in parts of the country, particularly Scotland, that are outwith the coverage of industry, actual or planned, even with the government initiatives to improve broadband provision. In many parts of Scotland where we operate, our members are the only choice for any credible kind of broadband.

This is but a brief response to the main operationally relevant points because we have only recently become cognisant of this consultation, and the deadline is today. It is acceptable for Ofcom to publish any and all of the information in this email, including contact information.

Many rural networks use wireless for at least part of their infrastructure. Often in the 5GHz spectrum. More spectrum availability is obviously better because it increases options and capabilities. These networks are often operating with low levels of financing so high monetary barriers to licensing would make an already challenging situation worse.

The light-licensing scheme in 5GHz is potentially a good thing, although I fear it is not being managed well by Ofcom. A requirement to register sites in a central place would be useful for spectrum management, but no actual management takes place in this band, and the data are not available for the operators to self-manage and coordinate -- which surely they would do as it is in their interest.

The recommendation of HUBS is therefore:

- No reduction in power in any part of the 5GHz band. This cannot be stated strongly enough. This change would immediately cause many important links in rural areas to become illegal and perhaps make provision of internet service unviable.
- Maintain the light-licensing régime but make the data available and useable, quite possibly through <http://data.gov.uk/> for the users to self-manage.
- Make more spectrum available for this use, particularly in the UHF band, so-called "whitespace" former terrestrial television because of its useful propagaion characteristics, but also in the SHF <10GHz bands.
- For short distance (< 10km), high bandwidth links, increase power output limits in the 24GHz ISM band, also with a light licensing arrangement.
- Check that the lower portion (24.05-24.15GHz) of the 24GHz band is indeed still in use by the emergency services, and if not, make it available on a similar basis because equipment working in 24.05-24.25GHz is quite commonly available.

We would be very happy, together with colleagues at the University of Edinburgh and the Open Knowledge Foundation (who has done much work on

data.gov.uk) to provide whatever assistance that we can in the development, operation and so forth of a useful database of information collected by a light licensing régime to enable coordination amongst spectrum users.

Yours in haste,
William Waites, Director
High-Speed Universal Broadband Services C.I.C.