

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Notice of proposals to make
The Wireless Telegraphy (Control of Interference
from Apparatus) Regulations 2015

To (Ofcom contact): Andrew Cutting

Name of respondent: Johnny Dixon

Representing (self or organisation/s): BT plc

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing	<input checked="" type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name Signed (if hard copy)



Issue 1

BT's response to:

**Ofcom Notice of proposals to make
“The Wireless Telegraphy (Control of Interference from
Apparatus) Regulations 2015”**

(Issued by Ofcom on 5 January 2015)

(BT response dated 13 February 2015)

BT's response to the Ofcom Notice of proposals to make "The Wireless Telegraphy (Control of Interference from Apparatus) Regulations 2015"

Introduction

BT welcomes the opportunity to comment on these proposals to create new Regulations. We understand that at present there is a gap in Ofcom's powers to deal with interference into radio receivers, and in general we support these proposals to allow Ofcom to identify faulty equipment, and take action to require the equipment to cease interfering.

Response to the consultation question

Do you agree that the Proposed Regulations correctly give effect to the policy proposals referred to, and to the other intentions set out, in this document?

We have two observations which we would like to bring to the attention of Ofcom.

1. Whilst we recognise the primary purpose of these Regulations is to address interference into radio receivers, we would like to highlight that the electromagnetic emissions identified in these Regulations can also potentially cause interference into wired systems. However unfortunately, since these proposed Regulations fall under the Wireless Telegraphy Act, there seems to be no obvious means by which they could be extended to also offer protection against interference into wired telecommunication network equipment. Whilst such equipment is afforded some protection by the EMC Regulations there is nothing that addresses issues that arise due to changing electromagnetic characteristics. The statements made in the Policy objectives (clause 4.1 of Notice of Proposals) apply equally to wired communication networks and one may argue these carry more critical data in this respect than a wireless network. We would therefore welcome this aspect being also addressed for wired network equipment.
2. We believe that in certain circumstances there may be problems with the practicalities of applying these proposals. This is because of the manner in which equipment is tested for compliance against the EMC Directive, usually in a controlled laboratory environment and applying a harmonised standard. How would an investigator be able to replicate these conditions in-situ in order to establish that the equipment has "not exceeded the level permissible under the requirements of the EMC Directive, when it was placed on the Community market or put into service in the Community"? We would therefore welcome further insight into the course of action that an investigator would take in applying regulation 5. In light of this consideration it may be appropriate to also consider whether any adjustment to the draft of the proposed regulation is required.