

Andrew Chong

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Dear Andrew

Re: UHF and VHF Spectrum planning: Call for inputs to Ofcom's plan for the potential procurement of models, tools and services

The States of Jersey and the States of Guernsey are grateful for the opportunity to respond to this consultation and this response represents the views of both governments.

As you will be aware Ofcom manages spectrum and international coordination on behalf of the Channel Islands. The licensing of spectrum in the Channel Islands is carried out by Ofcom by virtue of the powers given to it by the Wireless Telegraphy Act 2006 (WTA) and the Communications Act 2003 as extended to the Channel Islands by Orders in Council.

In practice, the Channel Islands Competition and Regulatory Authorities (CICRA) ascertain the level and nature of demand in the Channel Islands for the relevant spectrum and, after due process, recommend an allocation of it and the appropriate means to Ofcom. Ofcom may issue licences for spectrum use in the Channel Islands under the WTA where it is satisfied that CICRA's recommendation is consistent with its own statutory duties.

Given this the States of Jersey and the States of Guernsey would like to take this opportunity to reiterate the need for future spectrum planning models and tools to meet the needs of the Channel Islands as well as the UK and to be available to the Channel Islands as required.

Recent experience indicates that this is not currently always the case. CICRA is conducting a programme of consultation to make spectrum in the 800 MHz and 2.6GHz bands available in the Channel Islands and had anticipated being able to draw on Ofcom's UKPM to model the likely extent of DTT interference resulting in the 800MHz band. However, CICRA was informed by Ofcom that the version of the planning model used by Ofcom for this modelling in the UK did not cover the Channel Islands.

It is the view of the States of Jersey and the States of Guernsey that an effective spectrum planning model is integral to setting an appropriate spectrum strategy for the Channel Islands and delivering this in a timely manner. In addition, the proximity of the Channel Islands to mainland France means that accurate planning and a thorough

understanding of potential interference is vital for the effective management of spectrum in the islands.

The States of Jersey and the States of Guernsey therefore agree with the potential specifications set out by Ofcom in Annex 6 that: *"the terrain and clutter databases should cover the UK (including Northern Ireland), Isle of Man and Channel Islands"* and strongly believe that the population database must also cover the Channel Islands.

The States of Jersey and the States of Guernsey agree with Ofcom's high level summary of the basic requirements for any future UHF and VHF spectrum planning model. Namely that:

- It should be capable of planning frequencies and predicting coverage for digital broadcast services, on a basis that closely and consistently matches the results experienced in the real world. Accuracy, flexibility and prediction resolution are also important.
- It should be capable of assessing the effect of coexistence of other services, such as white space devices, with digital broadcast services.
- It should be accessible and available to all stakeholders. This could include access to the tool itself, the underlying parameters, the databases used, the propagation models and the outputs.
- It should be validated against measurements of DTT and DAB data such as field strength.

In terms of the options for future requirements for UHF and VHF spectrum planning, the view of the States of Jersey and the States of Guernsey is that, regardless of the approach taken, future spectrum planning will require greater precision to take into account the potential impact of new services such as 4G mobile and white space devices.

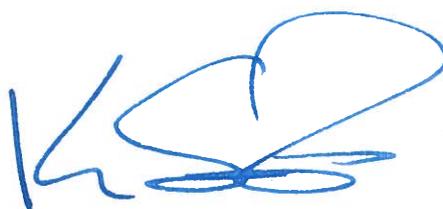
We would happy to discuss these issues further and to provide more information if necessary.

Yours sincerely



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