

From: webform@ofcom.org.uk
Sent: 18 June 2010 20:25
To: SRSP Contact
Subject: Responding to the SRSP: The revised Framework for Spectrum Pricing consultation

Title:

[CONFIDENTIAL]

Forename:

[CONFIDENTIAL]

Surname:

[CONFIDENTIAL]

Representing:

[CONFIDENTIAL]

Organisation (if applicable):

Email:

[CONFIDENTIAL]

What do you want Ofcom to keep confidential?:

[CONFIDENTIAL]

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Question 1: Do you agree with our proposed core principles of setting AIP? Are there additional matters that it would be helpful to clarify? :

No comment

Question 2: Do you agree that we should charge cost-based fees where AIP is not appropriate or AIP would not cover our costs? How do you think we should set cost-based fees in future fee reviews? Are there particular factors you think we should take into account, for specific licences fees or cost-based fees in general? :

No comment

Question 3: Do you agree with our proposed fee-setting methodology principles (set out below)? Are there additional matters that it would be helpful to clarify?:

No comment

Question 4: Do you agree with our proposal to move away from regular full-scale reviews to reviewing in response to evidence, as set out in Option 5?:

Ofcom should be committed to maximising use of the spectrum, so as to accommodate the maximum number of users.

It is for this reason that the predecessors to Ofcom commissioned research and development into Trunked Radio, culminating in the production of the MPT1327 standard.

The MPT1327 standard is recognised across the world as one of the leading trunked radio standard, and is recognised across the world as the most "open" standard, without patent and royalty restrictions. It enjoys the greatest number of manufacturers of equipment for the standard.

MPT1327 was originally commissioned with the idea of approving trunked systems in particular areas (regional operators), and operators across the entire UK (national operators).

The original concept of the entire MPT1327 system was such that if there was congestion in a particular area, radio users would be encouraged (and provided with a list) to use one of the trunked systems in their area.

By this method, a great number of users migrated to trunked networks, allowing the trunked networks to establish economies of scale, giving users a cheaper and better service than would be

available with "conventional" PMR, and providing a far more spectrally efficient method of communicating.

In return for this, recognised Trunked Providers were given reduced licence fees and superior coverage areas (in terms of power allowed, height allowed and protection ratios).

Why does Ofcom no longer embrace a standard which it (or its predecessors) actually championed, and no longer, in areas of saturated spectrum, even pass users details of established trunked networks in that area.

For example, in London there is a great deal of competition over spectrum. Spectrum prices are rising due to "congestion", and, particularly on UHF, applications are being rejected due to congestion. However, applicants are not being supplied with any lists of trunked networks, are not even being made aware that there are trunked networks in their area which may be suitable for their requirements, and the trunked network operators are being treated as the "bad guy" by no longer being given any favourable licence conditions, such as increased protection ratios and lower licence fees?

If everyone in London with a wide-area licence migrated to a trunked network, there would be no congestion on any of the spectrum in the London area, the economies of scale for the trunked operators would mean that they could charge less than even a licence would cost the customers (and they wouldn't have to pay for base stations, radio sites, etc), and the "customer" would get a far greater service than would be possible with their own system.

With the advent of the internet, it would not be impossible for Ofcom, upon a licence application "refusal" or even one which would place a burden on already congested spectrum, to supply the applicant with a list of trunked providers in that area. The applicant could then quickly look on the internet for all such providers, and make a comparison between them all to see if one was suitable for their requirements.

60-70% of radio users are not even aware that trunked systems exist. They believe that with the closure of "National Band 3" and "GEC National One", and with the demise of "Fleetcomm" that all trunked radio operators have now shut down. They are not aware of the rebuilding of large national networks, and of the smaller regional operators which have existed for many years. If applicants were made aware of these, maybe they may consider using trunked radio instead?

Question 5: Do you agree with our process for assessing the priority of future fee reviews? Are there other sources of evidence of misalignment between fees and spectrum value or spectrum management costs that you can think of, and what weight should we give them?:

No comment

Question 6: Based on our proposed criteria, or other criteria you would propose we use, what do you think our priorities for future fee reviews should be? Please tell us your reasons for thinking these should be prioritised. Do you agree that we should prioritise a fixed link fee, as some stakeholders have suggested to us? :

No comment

Question 7: Do you agree with our proposed approach to post-review evaluations? :

No comment