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CONSULTATION ON THE LICENSING OF 2 GHZ MSS COMPLEMENTARY GROUND COMPONENT (CGC) FOR AERONAUTICAL USE – UPDATED MOD RESPONSE

1. Regarding OFCOM's consultation on the licensing of 2 GHz MSS Complementary Ground Component (CGC) for aeronautical use, published 22 February 2016, MOD has a concern regarding the MOD Oakhanger Space Operations service in the adjacent frequency band of 2200-2290 MHz.
2. It is requested that OFCOM consider the Recommendation ECC/REC/(10)01 "Guidelines for Compatibility Between Complementary Ground Components (CGC) operating in the Band 2170-2200 MHz and EESS/SOS/SRS Earth Stations Operating in the Band 2200-2290 MHz" in their consultation to ensure compatibility between CGC in the band 2170-2200 MHz and earth stations operating in the adjacent band 2200-2290 MHz.
3. MOD would like to work with the CGC licensees to evaluate compatibility between their operations and Space Operations at Oakhanger. To assist with any assessment, MOD requests details of the location, antenna height and gain, and transmit power and emissions. MOD will then look into cooperative testing early on in their site selection to identify and assess any required mitigation measures. Our aim here is to provide a level of confidence of compatible operations.
4. The rationale for this request is as follows:
 - a. In para 1.7 of the OFCOM Consultation, the proposed technical conditions in the licensing reference CEPT compatibility studies to safeguard adjacent users, both in-band and adjacent, from harmful interference. This CEPT study is ECC Report 233, "Adjacent band compatibility studies for aeronautical CGC systems operating in the bands 1980-2010 MHz and 2170-2200 MHz".
 - b. In para 7.19, the consultation uses CEPT studied interference scenarios that do not include EESS/SOS/SRS earth station operations in the band 2200-2290 MHz.
 - c. ECC Report 233 (page 12) defers to Recommendation ECC/REC/(10)01 for addressing the potential interference from aeronautical CGC ground stations to EESS, space research and space operations earth stations.
 - d. Recommendation ECC/REC/(10)01 provides criteria when coordination of CGC base stations is required. In general, when emissions are anticipated to exceed a provided emissions mask and within a 60 km radius to earth stations.

Yours sincerely

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