

Organisation: DECT Forum

Question 1: In the light of the complexities of the transition, do you have views on the relative value of a 2x5 MHz block as opposed to a 2x3.3 MHz block for high power mobile use?:

N/A

Question 2: Are there any other developments, in the UK or in Europe, relevant to our policy in this band that we should be aware of? In particular, are there other potential applications that could be deployed in the band under a low power shared access regime? It would also be helpful to receive any updates from the current CSA licensees on their plans.

DECT Forum has received complaints over the use of LTE in the DECT guard band. Example 1: One such complaint was returned to us from Turkey where LTE is in use in the guard band since April 2016. The LTE base station in this case is positioned very close to a DECT corporate PBX system. During calls, the interference level increases resulting in a higher number of bad frames per second received from the handset by the base station, which in turns leads to voice quality degradation. Example 2: In this case DECT equipment is used in an Austrian health care institution: "It has been reported from several sites, that portables lose connection to the system and/or experience bad speech quality with calls even being dropped in outdoor areas. No obvious reason could be found while checking the system internally. The environment has been verified and as a common factor there was a high density of LTE antennas around these sites.

Question 3: Do you agree with this preliminary view that we should not trigger a change from a low power shared regime to a high power single use regime at this point?

N/A

Question 4: Do you think that the stations could be deployed in the DECT guard band without material interference risks or need for coordination? If so, do you have a view on the conditions for exemption such as power limits, indoor/outdoor use or others?

We are concerned that the consultation on the policy for the DECT guard band is entirely based on the following statement on page 14 section 3.3. "CEPT has looked several times at the co-existence of cellular mobile systems in the 1800 MHz band with systems in adjacent bands. The results of the analysis are captured in three Reports: ERC report 10016 (February 2000), ECC Report 9617 (March 2007) and CEPCEPT Report 4118 (November 2010). These reports cover co-existence of GSM, 3G and 4G systems successively. The analysis and conclusions in these reports indicate that neither a guard band nor mitigation techniques are required to ensure co-existence between neighbouring use of DECT and high power mobile using GSM, 3G or LTE technologies." However, this statement is not substantiated by the referenced documentation. According to CEPT report 41, page 34, chapter 8.4, DECT systems will be negatively influenced by indoor LTE systems in the DECT guard band

Question 5: Are there technology developments, such as polite protocols, that would facilitate coexistence of stations in the band?:

N/A

Question 6: Do you think it would be possible to coordinate deployments if the number of licences was higher than twelve, potentially unlimited?:

N/A

Question 7: Do you think it would be possible to have different coordination procedures for different types of use?:

N/A

Question 8: What do think would be the most appropriate authorisation approach regime in a low power shared access regime for this spectrum (and why)?:

N/A

Question 9: Do you have comments on the choice of approach to setting fees under each of the options for licensing low power shared access to the DECT guard band?:

N/A