

NATS welcomes the opportunity to respond to this CFI and wishes to raise some concerns about the potential use of self-installed mobile communications repeaters were they to be capable of operation in certain frequency bands.

There are situations where Ofcom's licensing regime requires the siting of mobile base stations in certain bands to be co-ordinated by the mobile operators with other users of the radio spectrum. These other users might be operating either in adjacent frequency bands or within shared frequency bands. If self-installed repeaters were to be introduced that are capable of operation in such frequency bands then it appears to NATS that this would risk these co-ordination agreements being broken. Moreover, were these repeaters to be made licence exempt, then their locations could not be controlled and would not be recorded. This would appear to make it difficult, if not impossible for interference issues to be resolved by Ofcom, particularly where for example, a number of mobile users in an area of perceived poor coverage installed such repeaters.

A particular situation that would be of concern to NATS is that relating to the co-existence of the mobile service below 2 690 MHz and radar systems operating in the band above 2 700 MHz. Mobile operators are required to keep power levels below a certain aggregate threshold around radar systems in order to protect the radar system operation. If self-installed repeaters were to be introduced that are capable of operation in the band below 2 690 MHz it appears to NATS that were these to be outside the control of the mobile operators then this would risk the aggregate radar protection thresholds being breached. The necessary enforcement action to resolve any interference to the radar systems would then, as described above, be made more even difficult where the locations of these repeaters is not known.

In NATS' opinion a potential solution to this problem could be for mobile repeaters, whether licensed or exempted, to be permitted to operate only in mobile bands where there are no base station siting / frequency co-ordination requirements. NATS would also observe that applying Ofcom's experience from the consideration of the requirements for GNSS repeaters may be of benefit when considering the potential and risks around mobile communications repeaters.