



15 June 2015

Response to: Consultation on Public Sector Spectrum Release: Award of the 2.3 and 3.4 GHz spectrum bands.

Dear Mr John Glover

Please find below the response of the European Hearing Instrument Manufacturers Association (EHIMA) on your Consultation for the Public Sector Spectrum Release: Award of the 2.3 and 3.4 GHz spectrum bands.

Our association EHIMA is representing the 6 largest Hearing aid Manufacturers world-wide.

Response:

Whilst other spectrum allocations to the Mobile sector have caused great expense to the taxpayer and citizens, there have been solutions to any interference issues. However the award of the 2.3 GHz band brings into question the balance between technical/commercial versus the good of citizens when allocating spectrum.

Use of this allocation will impinge on the daily lives of very many citizens using the 2.4-2.483 GHz band for devices which improve their ability to interact with daily life. Such devices include keyboards for the blind, assistive hearing devices for children and adults, and a wide range of medical devices especially implanted sensors using body area networks.

Testing by Ofcom and others has clearly shown that interference will be caused when a handset transmits on the proposed allocation in proximity (1-5m) to the devices identified above (plus many other devices using the 2.4-2.483 GHz band). Currently there are no solutions except as suggested by Ofcom to move away from the interference source (if the user knows what is causing the interference).

There are two aspects which Ofcom have not addressed, and whilst accepting that in a strictly technical approach, with current testing they are correct in their statistical approach to the interference but have taken no account of the increase in interference as the handsets and repeaters proliferate in the market place over the coming years:

1. Ofcom, DCMS and the UK government have a wide range of responsibilities under both UK and international agreements on facilities for the disabled. No account has been taken of the confusion and

disruption which will be experienced by users when unidentifiable interference is generated to the various devices used by the disabled.

2. The devices identified above are in use by millions of citizens in the UK and have been in use for many years. Ofcom proposes that the manufacturers and suppliers of such equipment have the responsibility to inform users. There are no proposals in the statement to enforce a warning to those purchasing 2.3 GHz handsets or equipment, nor to ensure that non 2.3 GHz handsets are available for purchase. Unfortunately the numbers of radio engineers who are aware of this problem are extremely small in proportion to the general population.

EHIMA proposes:

1. That the spectrum for auction should be reduced to below 2.35 GHz where current filters take effect;
2. Ensure that any one purchasing or installing 2.3 GHz equipment either handsets or repeaters will be informed of the potential interference issues;
3. That information is provided to industry and charities for the disabled, which include many small companies who are generally unaware of the problem;
4. That use of the spectrum is delayed until efficient filters and redesigned equipment for the disabled is available.

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