

10 August 2009

Stephen Jones  
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Dear Stephen,

### **London 2012 Olympic Games & Paralympic Games: Draft Spectrum Plan**

Intellect welcomes the opportunity to respond to this consultation. The success of 2012 Olympic and Paralympics Games (“the Games”) is to a large extent dependent on the deployment of a sound and well managed communications infrastructure across the various Olympic location sites in the UK for their duration. Ofcom is a key part of this process, and we commend your foresight in planning comprehensively for it.

Ofcom’s approach to this undertaking, as well as its assessment of the possible demand and supply of spectrum, is supported by Intellect members. We note that a large part of the demand will be met through use of existing satellite infrastructure in a ‘business as usual’ mode. We endorse Ofcom’s intention not to revoke or vary existing spectrum licenses in order to meet the requirements of the Games. The temporary clearance of bands, and their temporary assignment to other users during the Games, is an appropriate way to facilitate this. At the same time, we would recommend that Ofcom provides further information on the means that will be employed to ‘clear’ temporary users from such bands following the Games. A comprehensive effort to mitigate the risk of inadvertent interference occurring to current users of such bands will be necessary. The use of a spectrum surveillance capability at major sites could be a valuable resource working in conjunction with your mobile interference teams for the fastest resolution of any occurring problems.

In relation to the above point, we clearly share the view that Ofcom needs to consider all possible alternatives to the temporary removal of existing spectrum licensees from spectrum during the Games. Employing appropriate means to try to reduce bandwidth requirements during the Games will help to avoid this occurring. Ofcom’s encouragement of the use of wires, fibre, infrared and private cellular networks is welcomed. We are also pleased that the proposed equipment to be used will be to the relevant standards even though some will be in bands not licensed in the UK.

In terms of spectrum allocated to specific applications, we are pleased to note Ofcom’s reference in its consultation document to the Olympic Broadcast Service (OBS) plans to deploy Wireless CATV at the Games, through which spectators will be able access video via handheld devices within venues and their surroundings. We believe this service would serve as an important demonstration to the general public of the true capabilities of wireless broadband technology. We would fully support any initiative to allocate an 8 MHz channel in the UHF Band IV or V for this purpose, which has already been envisaged in trials of this technology. Broadband mobile systems with Smartphones would also further enhance spectator experience. Furthermore, we would suggest that Wireless CATV is a broadcast service. As such, Wireless CATV should be considered as a ‘guaranteed’ rather than a ‘non-guaranteed’ service by Ofcom in the context of the Government’s guarantees on appropriate

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allocations of spectrum to the International Olympic Committee (IOC) in its bid to host the 2012 games.

In broader terms, Intellect believes that the 2012 Olympic Games present a unique opportunity to showcase UK technological innovation. We appreciate that the main operation of the Games will not be based on these services. Ofcom's intention to "support LOCOG's and others' roles [in promoting innovation] in line with [their] duty under the Wireless Telegraphy Act" is welcome. However, we also believe that Ofcom should make firmer provision for supporting the deployment of innovative technologies by broadcasters or network operators at the Games. There is a need for further clarity of over how such indicated "support" will be facilitated from a spectrum management perspective.

Yours sincerely,

  
p.p.

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