



Met Office response to Ofcom Consultation:

Licence Exempt Short Range Devices in the 870 to 876 MHz and 915 to 921 MHz Bands: Technical Proposals

As referred to in this consultation, the Met Office operates Doppler Wind Profiling Radars (WPRs) in the 915 MHz band and responded to the previous 2013 "Update & Way Forward" consultation to the effect that we could not envisage how continued interference-free operation could be fully accommodated with the introduction of LE devices to the band. The Met Office has subsequently engaged in further discussion with Ofcom and on studies in CEPT and whilst it believes a risk of interference remains to WPR operations, the key issue will be in remediation of interference as and when it occurs.

Q1. Do you agree that regulations should be made to enable the licence exempt use of SRDs in the 870 to 876 MHz and 915 to 921 MHz frequency bands, in line with the amendment of ERC Recommendation 70-03?

The Met Office believes that there will be a risk of interference to WPRs from (eg) RFIDs with the introduction of LE devices into this band, but at the same time we do not believe that exclusion zones would be enforceable in an LE band. Whilst we do not agree that 5% represents a particularly low figure when considering disruption to WPR data (where anomalies in data can lead to misleading forecast model information), we are content that interference risks *may* be manageable, subject to actions undertaken by both ourselves in terms of (eg) installing further shielding at our facilities and, critically, by Ofcom in giving confirmation that enforcement action can and will be undertaken for current and future installations across the 915-921 MHz bandwidth should significant interference occur from an identified SRD source. The statement in para 3.44 (p19) stating that LE regulations require that devices "*shall not cause or contribute to any undue interference to any wireless telegraphy... therefore, if undue interference is caused to WPR, Ofcom can if necessary take enforcement action*" appears to offer that assurance and we welcome further Ofcom engagement to ensure that this approach to interference management works in practice, with particular regard to issues of SRD compliance and timescales to enforce. On this basis, we can agree that regulations can be made in line with Recommendation 70-03, providing that sufficient guarantee of continued operation for incumbent users is fully demonstrated.