

Response of the FCS to the Ofcom Consultation:

**Responses to the Call for Input and Consultation on next steps of the release of
spectrum within the frequency ranges 143 MHz to 169 MHz**

Professional Radio Communications (Business Radio)

FCS – June 2014

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Introduction

The Federation of Communication Services is the UK trade association for the professional communication services sector. Our 400 members and associates deliver voice and data functionality and services to business and public sector users by means of copper, fibre and radio transmission infrastructures. We are pleased to have the opportunity of responding to the Ofcom Consultation on Spectrum Management Strategy: Ofcom's Approach to and Priorities for Spectrum Management over the Next Ten Years.

This contribution builds on other contributions in relation to the growing need for future increase in content richness within the business radio operational philosophy.

Responses to Questions

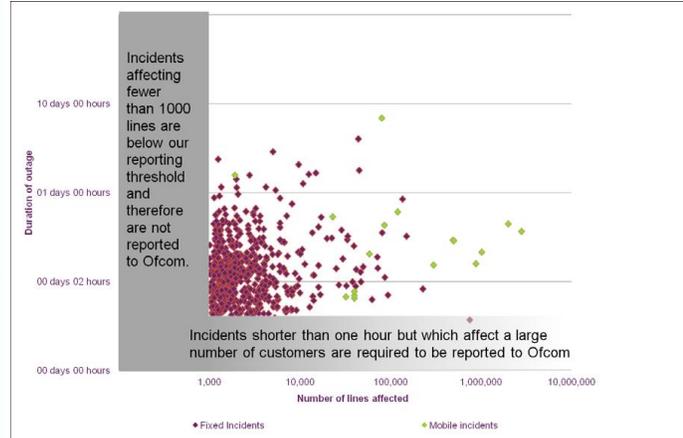
Q1. Do you agree with the proposed approach for spectrum management?

Yes. The FCS further notes that a structured approach to future operational needs is a particularly valuable option.

In data available on the Ofcom website and in their 2013 Infrastructure report, Ofcom makes it clear that the current arrangements for 3G coverage provide neither ubiquitous geographical coverage nor a high-resilience service. These results are repeated here for convenience:

UK Mobile Services Map 2013

Level of outdoor mobile coverage by administrative authority



The Map shows the level of GEOGRAPHIC coverage currently achieved with 3G services (green is good)

The graph indicates the extent of the more serious service interruptions for 2013.

Business Radio users currently make use of public mobile for data service supplementing their voice service. The FCS believes this demand for data is both growing in volume and gradually becoming more operationally important to the user. As this continues it will become less and less acceptable for the data service to suffer interruptions for whatever reason and so the demand for a much more resilient data service is likely to rise. At that point, data service provided under the principles of business radio will be in demand and force a natural migration for many users.

Thus management for future spectrum capacity for data services that can meet the resilience requirements both prudent and in the wider interests of the UK.

Q2. Do you agree with the proposed approach for Business Radio assignments?

Yes

Q3. Do you agree with the proposal to allocate spectrum for Maritime and/or Land Search and Rescue use?

Yes

Q4. Do you agree with the proposal to make some spectrum not currently assigned to other applications available on a temporary for Amateur Radio use with these restrictions?

Yes