

Organisation: GTSP Limited

Question 1: In the light of the complexities of the transition, do you have views on the relative value of a 2x5 MHz block as opposed to a 2x3.3 MHz block for high power mobile use? :

2x5 MHz block will be easier to implement, technically.

Question 2: Are there any other developments, in the UK or in Europe, relevant to our policy in this band that we should be aware of? In particular, are there other potential applications that could be deployed in the band under a low power shared access regime? It would also be helpful to receive any updates from the current CSA licensees on their plans.:

Shared access scheme without delegation i.e. a central radio resource established with participants or licensed operators in roaming capacity would be wasteful.

There is an obvious lack of co-operation within the industry, even those who tried to roll out services are prohibited by the MNOs for roaming access.

Question 3: Do you agree with this preliminary view that we should not trigger a change from a low power shared regime to a high power single use regime at this point?:

A high power single use should be encouraged.

RAN sharing technology is abundant, license owners can connect their EPC/MSC/SGSN to a shared centralised RF fronthed.

That's the only way the frequency allocated could be put to good use.

Question 4: Do you think that the stations could be deployed in the DECT guard band without material interference risks or need for coordination? If so, do you have a view on the conditions for exemption such as power limits, indoor/outdoor use or others?:

Yes, stations can be safely deployed with interference mitigation.

Question 5: Are there technology developments, such as polite protocols, that would facilitate coexistence of stations in the band? :

There are filters available and so also are software programmable protocols to ensure mutual coexistence.

Question 6: Do you think it would be possible to coordinate deployments if the number of licences was higher than twelve, potentially unlimited?:

It does not matter how many licences are willing to deploy services, if OFCOM provide the centralised RAN sharing mechanism.

Question 7:Do you think it would be possible to have different coordination procedures for different types of use? :

Yes, as I have explained earlier. It's even possible to initiate community wireless infrastructures on the spectrum. Another way of viewing this is an LTE operated within a Borough or a Council with roaming access to adjacent or contiguous access to all local areas served nationwide.

Question 8:What do think would be the most appropriate authorisation approach regime in a low power shared access regime for this spectrum (and why)?:

A centralised shared RAN, with access granted to each licensed operator is more feasible. 10 years is a long time to leave the spectrum fallow with no discernible service. This may even assist poorly connected areas and also rural areas.

Question 9:Do you have comments on the choice of approach to setting fees under each of the options for licensing low power shared access to the DECT guard band?:

If the community wireless scheme is adopted, the license fees should be minimal in order to attract operators.