

From: do_not_reply@squiz.net
Sent: 10 February 2017 17:47
To: Kevin Delaney
Subject: EXTERNAL: Consultation response: Strategic Review of UHF Band 1 and Band 2 - 410 to 470 MHz - Tony Carder Airwave none confidential publish summary

Response:

Your details

- Full name: Tony Carder
- Representing: Organisation
- Contact phone number: 07764144254
- Organisation (Optional): Airwave Solutions
- Email address: tony.carder@airwavesolutions.co.uk

- Confirmation: I confirm that the correspondence supplied with this form is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified below, and I authorise Ofcom to make use of the information in this response to meet its legal requirements.

Confidentiality

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Your response

- Question 1: Do you agree with our assessment of the trends in current and future demand in the band?:

Yes - There could be potential for localised or regional wideband solutions in UHF Band 1 or UHF Band 2 but there is insufficient available spectrum to provide any national systems. In addition there could be potential “Internet of Things”, Smart Grid. E-Health applications networks within the UHF Band 1 or UHF Band 2 which may require small amounts of dedicated spectrum.

- Question 2: Do you agree with our assessment that the risk of continental interference is limited to the east and south east of the UK during periods of atmospheric lifts?:

No - The current review concentrates on interference from the South/South-East/East Anglia area from France/Netherlands/Channels Islands. There is potential for future UHF Band 1 wideband systems in Republic of Ireland or Isle of Man, therefore the future interference may be affecting the Wales/Western Scotland and possibly Devon/Cornwall coastal areas. These areas need to be monitored and considered for future interference effects.

- Question 3: Do you agree with our assessment that these bands could enable the implementation of our UHF policy proposals? Are there any additional uses you think we should consider if this spectrum becomes available for use?:

It is likely that some Emergency Services users will remain in the 380-395MHz band until at least 2020 and potentially beyond if ESN becomes delayed, this could limit usage of UHF Band 1. However Air-Ground-Air (AGA), London Underground or Direct Mode (DMO) users in the 380-395MHz band may require spectrum beyond 2020 in UHF Band 1. Users in the 410-414MHz/420-424MHz also have long term licenses (or attributed to Emergency Service usage) which may limit other usage within the UHF Band 1.

- Question 4: Do you agree with our conclusion that aligning UHF Band 2 with continental Europe is not required?:

The band alignment may bring some benefits but the cost to users and disruption may outweigh any benefit gained.

- Question 5: Do you agree with our proposal to add additional channels to the Simple UK and Simple Site licence products from spectrum within the 458.5 to 459.5 MHz band?:

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- Question 6: Do you agree with our assessment that the risk of

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interference between Simple UK and Simple Site use and licence exempt short range devices in the 458.5 to 459.5 MHz band is low, and that any interference can be mitigated by users changing channels?:

- Question 7: Do you agree with the proposal to initially increase the sharing criterion from two to three, and, subject to further analysis, move to four in the longer term? •
- Question 8: Do you agree with our proposal to change the planning levels we use in our modelling by reducing both the RSL and unwanted levels by 12 dB for VHF Band 1 and VHF Low band? •
- Question 9: Do you agree with our assessment that moving towards more common duplex spacings will increase spectrum efficiency? Yes - a common spacing would logically improve efficiency.
- Question 10: Do you agree with our proposed activities for improving stakeholder guidance? Are there further steps you think Ofcom could take to ensure stakeholders and licensees can make an informed decision when considering their licencing needs? •
- Question 11: Are there any other policy options you think we should consider to make use of UHF 1 and 2 more efficient? Yes - there may be some systems that require wider channels such as 50kHz or 100kHz to deliver higher bandwidth solutions which cannot be delivered in 12.5kHz or 25kHz channels, these may also be non-standard technologies which could co-exist within the UHF Band 1 or UHF Band 2 areas and this may require some areas of these bands to become more technology agnostic.