

Introduction

About techUK

techUK represents the companies and technologies that are defining today the world that we will live in tomorrow. In a very real sense techUK represents the future.

At the heart of tech in the UK is an ecosystem of 270,000 companies producing digital technologies, products and services. From east to west, north and south, from enterprise class organisations to established medium-sized businesses, growing small businesses and an exciting generation of tech start-ups: the UK is a hotbed of tech talent and techUK exists to represent the sector in its entirety.

Our role as techUK is to ensure that we seize the potential for good and address the disruptive new challenges that change and innovation always present. We work to understand the opportunities that technology provides; to support the companies and innovators that can realise those opportunities.

This underpins our simple vision to ensure that tech is good for the UK, the UK is good for tech and that tech is good for people.

Preamble

techUK (formerly Intellect) welcomes Ofcom's further consultation on the 870-876 MHz and 915-921 MHz bands.

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.

In techUK's response to the previous consultation¹, we highlighted the huge benefits that could be derived from this band, especially as it has lain mostly fallow for over ten years. techUK highlighted that:

- The bands should ideally be made available for future RFID, SRD and other licence-exempt applications, including Assisted Listening Devices (ALDs), as soon as possible. The demand for such applications [in existing bands] has grown faster than expected and is proving valuable across a range of industries.
- The Home Area Network (HAN) is critical to the success of the smart metering programme and DECC has identified 870-876 MHz as suitable spectrum
- Wide Area Network (WAN) connectivity to smart meters are in some cases based upon mesh technologies in the 870-876 MHz spectrum

techUK notes that the sharing studies within CEPT is now complete and, although conservative in its nature, believe that the associated sharing proposals are appropriate for the UK's current needs. The work has been thorough and has, for example, ensured that sharing with GSM-R (for railway) in its extended bands (873-876MHz/915-918MHz) would be feasible, were Ofcom to choose to allocate those bands for that purpose. Furthermore, considering that current measures for SRD operations are based on previously defined technical characteristics (e.g. ETSI TR102 649-2), we welcome Ofcom's active involvement in the ongoing ETSI ERM activities aimed at developing a system reference document for the introduction of wider bandwidth SRDs for use in the 870-876 MHz and 915-921 MHz bands.

techUK does believe, however, that the work on examining and defining Network Relay Points (operating at a duty cycle of 10%) are necessary to support many applications and derive the full economic benefit of the spectrum. techUK, whose members have been carrying out testing of technology to be used in the band, and believes that the associated harmonised standard should specify tighter restrictions on spurious emissions than EN 300 220 for devices to be co-sited on mobile masts, and this should be a requirement of the deployment of such devices under a light licensing regime. This stipulation is made on the basis that it does not impact the conditions surrounding SRD more generally – whereby devices that are found to degrade base station performance may be removed.

¹ Intellect response to the Ofcom Consultation on: 870-876 MHz and 915-921 MHz, April 2013.
<http://www.techuk.org/insights/reports/item/994-ofcom-consultation-on-870-876-mhz-and-915-921-mhz>