



**NOMINET**

**Contacting us**

**Phone:** 01865 332211

**Fax:** 01865 332288

**Email:** [adam.leach@nominet.uk](mailto:adam.leach@nominet.uk)

**Write to:** Nominet UK, Minerva House, Edmund Halley Road,  
Oxford Science Park, Oxford, OX4 4DQ

**Web:** [nominet.uk](http://nominet.uk)

**May 2016**

**Notice of proposals to make the Wireless Telegraphy  
(White Space Devices) (Exemption) (Amendment)  
Regulations 2016  
Consultation Response**

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

Consultation title: Notice of proposals to make the Wireless Telegraphy (White Space Devices) (Exemption) (Amendment) Regulations 2016

To (Ofcom contact): Vaughan John

Name of respondent: Adam Leach

Representing (self or organisation/s): Nominet

Address (if not received by email): adam.leach@nominet.org.uk

### CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing  Name/contact details/job title

Whole response  Organisation

Part of the response  If there is no separate annex, which parts?

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

### DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name Adam Leach

Signed (if hard copy)

# General response

## Introduction

### About Nominet

Nominet is the private not-for-profit company responsible for running the .uk internet domain name registry. We are a medium sized company employing approximately 150 people in Oxford, London and Cardiff. Nominet's articles of association commit the company to working for the public benefit and since 2008 any surplus generated by the company has been donated to our charitable foundation, the Nominet Trust. We believe the Internet is a powerful force for social and economic good, and we make it our business to maximise its positive impact.

We are now starting to use the technical expertise within the company to explore new business opportunities in areas such as cyber security, smart cities, the Internet of Things and spectrum management and are investing heavily in research and development.

### Nominet's involvement in TV White Spaces

Nominet has been interested in the future of TV White Space (TVWS) for a number of years now as we believe that it has the potential to provide a range of opportunities and solutions to not only increase access to the Internet at home and abroad, but also to act as an enabler of the emerging Internet of Things technologies. Over the past two years, Nominet's R&D team has built a TVWS database and qualified for participation in Ofcom's pilot scheme as a White Spaces Database (WSDB) provider. The on-going collaboration between Nominet, Ofcom, and the other stakeholders has helped inform Ofcom's development of the TVWS regulatory framework. Our WSDB has been used for academic research, for exhibits (e.g. at the Glasgow Science Centre during the Commonwealth Games), and in two live trial projects.

Most notably, Nominet has deployed prototype TVWS hardware to enable real-time time measurement of Oxford's streams and rivers as part of a local community project called the [Oxford Flood Network](#). This has demonstrated a successful practical use of TVWS in enabling Internet of Things applications. In Oxford people are installing their own water-level monitoring sensors in order to share local information and knowledge about rivers, streams and groundwater to build a better, hyper-local picture of the flood risk at high-resolution and at street level on the streams, groundwater and the complex basin of the Thames and Cherwell rivers.

Following Ofcom's decision to release TV white spaces for use at the end of 2015, Nominet was the first company to successfully complete the qualification process for its WSDB. These research projects have provided Nominet with practical experience of working with all the components of the TVWS framework and we expect these will be the basis of the frameworks for spectrum sharing in other bands.

# Response to question

## Question 1

*We seek comments on the Proposed Regulations, a draft of which is set out in Annex 5 to this Notice.*

Nominet would like to thank Ofcom for its ongoing commitment to TV White Spaces in evaluating the opportunities that exist and for designing a regulatory framework in support of those technologies. Nominet believes that the adoption of dynamic spectrum sharing techniques is essential to avoid the impending wireless spectrum crunch, caused by the rapid growth of smartphones and IoT devices. The existing static models used for allocating spectrum are inherently inefficient and unable to handle the explosion of wireless data traffic. The use of dynamic spectrum management for TVWS has shown that it can be successfully implemented and it is an important first step for using the technique more widely in other spectrum bands.

Nominet agrees with the modifications to the Proposed Regulations and believes that the increasing number of geo-location database providers indicates the growing interest of the industry sector in technologies that allow a more efficient and dynamic access to spectrum resources.