

Response:

Your details

- Full name: Andy Williamson
- Representing: Organisation
- Contact phone number: 01312448051
- Organisation (Optional): Scottish Government Emergency Responder Telecommunications
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- 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

- We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (Optional):
- If you want part of your response kept confidential, which parts? (Optional):
- Confidential Responses Only:
- Ofcom may publish non-confidential responses on receipt:

None

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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?:
- 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?: Yes
- Question 3: Do you agree with our assessment that these bands could enable the implementation of our UHF policy

We believe you may have underestimated IoT usage in your assessment. Please see the LoRa Alliance web site for more details on the standardisation and usage of low power IoT LPWA connectivity. The channelisation and building penetration of the two bands is an ideal property for LPWA solutions and would take it out of the ISM band, which could be open to interference.

Yes. Please see the response to question 2 for additional use.

proposals? Are there any additional uses you think we should consider if this spectrum becomes available for use?:

- Question 4: Do you agree with our conclusion that aligning UHF Band 2 with continental Europe is not required? Yes
- 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? Yes
- Question 6: Do you agree with our assessment that the risk of 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? Assuming that it will be the new user that changes channel, not an existing user.
- 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? Yes
- 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? Yes
- Question 9: Do you agree with our assessment that moving towards more common duplex spacings will increase spectrum efficiency? Yes
- 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? Yes
- Question 11: Are there any other policy options you think we should consider to make use of UHF 1 and 2 more efficient? Not at this time