

Ofcom Consultation

British Entertainment Industry Radio Group (BEIRG)

Comments on the Notice of proposals to make the Wireless Telegraphy (White Space Devices) (Exemption) Regulations 2015

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Contact Details:

Jamie Slavin

Ranelagh International Ltd on behalf of the BEIRG Steering Committee

One Ranelagh Road

Westminster

London SW1V 3EX

Tel: 020 7828 1603

jamie.slavin@ranelagh-intl.com

Response

BEIRG retain the concerns previously expressed regarding Ofcom's decision to introduce licence exempt white space devices into UHF spectrum.

On the specific issue of the amendments to the Wireless Telegraphy Regulations, we are concerned by the following issues.

Height at which WSDs will operate

Ofcom still does not require the height at which WSDs are operating to be taken into account by a database. The operational height affects the propagation qualities of a device and hence the operational parameters of that device should reflect different heights.

In addition, as far as we are aware, the height of PMSE transmitting and receiving antennas is not currently accounted for in the PMSE licensing database, except where airborne use is licensed, rendering any predictions of propagation which are intended to protect PMSE potentially dangerously inaccurate. We believe that recording of the height of PMSE antennas in the licensing database will be necessary in order to correctly protect some PMSE operations from WSD.

Difference in update times between slave and master devices

PMSE spectrum allocations can change at short notice. These assignments need to be reflected in the database and communicated to the master devices in order to provide protection for PMSE. However, master devices only update in cycles of 15 minutes, leaving a long lag time in which there is a threat of interference to PMSE. This is an unacceptably long time in the context of a live performance or event.

Dedicated antennas on mobile devices

Mobile devices should not include antennas with external connectors as this increases the possibility of users connecting a new antenna with a higher gain. This increases the potential for these devices to cause interference to PMSE and DTT services. PMR 446 requires fixed antenna; why does the same not apply to WSDs, which will have a higher output power?