

From: do_not_reply@squiz.net
Sent: 13 February 2017 14:42
To: Kevin Delaney
Subject: EXTERNAL: Consultation response: Strategic Review of UHF Band 1 and Band 2 - 410 to 470 MHz Alex Cox MoD none confidential publish summary

Response:

Your details

- Full name: Alex Cox
- Representing: Organisation
- Contact phone number: 07880794419
- Organisation (Optional): Ministry of Defence
- Email address: Alexander.Cox117@mod.gov.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

- We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (Optional): None
- If you want part of your response kept confidential, which parts? •
- Confidential Responses Only: •

- Ofcom may publish non-confidential responses on receipt: Ofcom may publish non-confidential responses on receipt

Your response

- Question 1: Do you agree with our assessment of the trends in current and future demand in the band?: No comment.
- 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 comment.
- 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?: MoD concurs with Ofcom subject to the appropriate sharing conditions being agreed.
- Question 4: Do you agree with our conclusion that aligning UHF Band 2 with continental Europe is not required?: No comment.
- 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?: No comment.
- 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 MoD agrees with Ofcom's assessment. However, there are questions over the approach to frequency sharing (sharing licence exempt use with licensed use and with multiple channels assigned) being the most efficient way of utilising the spectrum.

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?: No comment.

- 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?: MoD understands the reasoning behind the proposed changes to the modelling planning levels, but has concerns around the potential noise increases in other bands, including those used by MoD, as a result of the changes in authorised licences issued under this proposed modelling and which will inevitably increase the in-band power calculated for a coverage area for licenses. Therefore, MoD requests that Ofcom regularly reviews the impacts of these changes to ensure other users of the VHF spectrum are not hindered in their use.

- Question 9: Do you agree with our assessment that moving towards more common duplex spacings will increase spectrum efficiency?: No comment.

- 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?: No comment.

- Question 11: Are there any other policy options you think we should consider to make use of UHF 1 and 2 more efficient?: No comment.