



Response to Ofcom's Consultation Document on:  
**Strategic Review of UHF Band 1 and Band 2**

*(Issued by Ofcom on 19 December 2016)*

**BT plc**  
**9 February 2017**

## Responses to the Consultation Questions

*Question 1: Do you agree with our assessment of the trends in current and future demand in the band?*

BT agree that the UHF Band 1 and Band 2 provide an important and valuable resource for the UK for a very broad range of users, from small businesses to large corporations (including BT), as well as others including the MoD, Emergency Services, and the utilities.

Whilst we believe that Ofcom should continue to enable access to the bands for these users, we also agree that the growth in M2M will see increasing demand for data connections at 410 – 470 MHz, to complement the 870 – 876 / 915 – 921 MHz & 2.4 GHz bands. The measures being proposed in this consultation document to facilitate increased occupancy of the UHF Bands could and should enable data systems to be operated to provide M2M communications, recognising that in most cases M2M will only require very low occupancy of a channel.

There is a range of technologies available or being developed (LoRaWAN, Sigfox, NB-LTE, etc) which would be capable of operating in these UHF bands and, in accordance with its duties, we believe that Ofcom should facilitate such technologies to be operated in the bands, providing this would not compromise the existing uses.

We also acknowledge the comment from TAUWI (§ 3.11) regarding the discontinuation of sub 2 Mbit/s private circuits, which are provided using “near end of life” equipment, and we are currently exploring alternative options, which include the possibility of radio systems operating in these UHF bands.

*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?*

We believe this to be correct.

*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?*

We agree that there may be opportunities for UHF Band Public Sector Spectrum Release (PSSR) in the future, particularly following the closure of the Airwave network, and we would encourage Ofcom to promote the availability of such spectrum for new M2M communication technologies.

*Question 4: Do you agree with our conclusion that aligning UHF Band 2 with continental Europe is not required?*

We support maintaining the existing duplex arrangements.

*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?*

We understand that the channels for Simple UK and Simple Site licences are quite heavily used, and hence we support the proposal to add additional channels to these licences.

*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?*

No comment

*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?*

No comment

*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