

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Release of spectrum within the frequency ranges 143 MHz to 169 MHz

To (Ofcom contact): Kevin Delaney

Name of respondent: Derek Banner

Representing (self or organisation/s): Critical messaging Association

Address (if not received by email):

CONFIDENTIALITY

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

Nothing	<input checked="" type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	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If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the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 Derek Banner

Signed (if hard copy)

Introduction

The Critical Messaging Association (CMA) welcomes the opportunity to respond to the document "Responses to the call for input and consultation on next steps of the release of spectrum within the frequency ranges 143 MHz to 169 MHz" dated 24 March 2014.

The CMA represents companies that work in the critical messaging field and at least one of our members operates a number of 25kHz channels within the band; the frequencies have not been listed but will be made available to Ofcom if requested.

On the whole the CMA welcomes the release of the new spectrum and fully supports Ofcom in the way they propose to allocate the new channels. However, we do have some reservations that are shown below.

Q1. Do you agree with the proposed approach for spectrum management?

CMA agrees with the approach for spectrum management.

Q2. Do you agree with the proposed approach for Business Radio assignments?

CMA agrees with the approach for Business Radio assignments however, we want to ensure that the current users are fully protected against new interference. Para 4.22 indicates that only Technically Assigned and Area Defined licences will be allocated using the newly available spectrum unless there is a need for the other classes. CMA recommends that **no** other licence classes are made available even if there is some demand, potential users should be directed to Technical or Area Defined licences. This approach will minimise the risk of new interference from new users to existing users.

Given this approach but in the unlikely event that existing users suffer from new interference from users of the newly available spectrum then it is the new users who should rectify the problems at no cost to existing users.

Q3. Do you agree with the proposed approach for Maritime and/or Land Search and Rescue?

CMA does not disagree with the approach for MCA and LANDSAR. However, we think that any incumbent spectrum users should be compensated for costs and inconvenience if they directed to change channels.

Q4. Do you agree with the proposed approach for Amateur Radio use?

CMA agrees with the approach for Amateur Radio use (and PMSE use).

Derek Banner

Chairman,

Critical Messaging Association - Europe

