

Title:

Mr

Forename:

David

Surname:

Mosson

Representing:

Organisation

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

Keep organisation confidential

If you want part of your response kept confidential, which parts?:

Keep organisation confidential

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Dear Sirs,

Our company has just completed a 3 year, multi-million £ roll-out program for the MOJ NOMS prison estate. We have installed in excess of 120 dual carrier, single site UHF Band II 450 - 470mhz systems across England & Wales (with 10Mhz offset). The systems have been "enhanced" in a number of sites to provide complex in-building coverage, using, specialist arrays and channel selective enhancers. The systems are vital for safety and security and cannot be easily migrated. There are approximately 18,000 handsets in daily use on these systems 24/7.

Question 1: Do you agree with Aegis's conclusions on congestion of current use of 420-470 MHz spectrum? Are there any other signs or areas of congestion that Aegis have not identified from their review?:

There has been little evidence of congestion in the public safety frequencies that we have been using, but we have re-used the frequencies in a controlled manner across all of England & Wales

Question 2: Do you agree with Aegis's conclusions on the future demand and use of 420-470 MHz spectrum over the next ten years? Are there any other future uses or areas for future demand that Aegis have not identified from their review?:

I do have concerns that the publicised ESN roll-out program for the emergency services will be considerably delayed. In addition to provide in-building coverage within prisons for this service to same degree will require considerable further investment and time, I cannot see this being a feasible solution for 10 years.

Question 3: Do you agree with Aegis's conclusions that there is not yet any UK demand for wideband services in the 450-470 MHz band (which could for example, be used to improve rural mobile coverage)? Please provide any supporting evidence for your position.:

As advised in the general comments, most of our recent experience (past 3 years) has been in the Public sector space, and we have managed the deployment of spectrum to minimise congestion and interference.

Question 4: Have you experienced degradation in your systems? performance which you consider to be caused by continental interference in the last 12 months? If yes, what approach did you take towards managing and minimising interference?

Please provide any supporting evidence which explains the frequency, impact, duration, time, location and cause (whether suspected or investigated) of the interference

with respect to your specific sector(s):

We have seen no evidence of recent system degradation other than some localised trials with GSM jamming technology.

Question 5: Is there additional information relevant to the configuration of the 420-470 MHz band that we should consider in developing our approach to its future management? Please provide any evidence to support your views.:

Again, focused on the 450 - 470Mhz band for public safety use, I cannot stress enough how difficult it is change radio systems in prisons, for safety, for security and for the general logistical problems that this entails. Not to mention the complexity and range of buildings that would need to have in-building radio coverage.

Question 6: Do you agree with the potential solutions Aegis have proposed for managing the 420-470 MHz band to both meet the continued growth in congestion and demand from incumbent spectrum users, and to facilitate the deployment of wideband technologies? Are there any other solutions which you consider we should examine that Aegis have not identified from their review?

Please provide any evidence to support your position and reference each solution in your response as appropriate.:

I am fairly neutral over their approach and findings

Question 7: Do you have any further comments relevant to how we might manage spectrum between 420-470 MHz? :

No

Question 8: Do you have any comments on our proposed programme of work, the outcomes from which we will use to inform future decisions on how we manage the 420-470 MHz band? Are there any additional areas you consider we should explore?:

Other than consulting extensively with the Public sector to understand the gravity and importance of maintaining reliable communications for prison staff during any proposed transition or change program