

-----Original Message-----

From: Gilliver, John (UK) [<mailto:john.gilliver@baesystems.com>]

Sent: 05 December 2014 17:13

To: UHFstrategicreview

Cc: Gilliver, John (UK)

Subject: (guess!)

I've tried to use your "online response form", but something's broken since last time I tried: I haven't changed anything at this end. (Firefox 25.0.) When I click "submit", I get a message something like "the page you asked for is not available". ("Submit" was below the text "To help prevent spam, please type the words you see below."; I saw neither any words nor anywhere to type them, but that has been the case with previous consultations, and my submission has gone through anyway. This time it hasn't.) [I did try Internet Explorer 8, but that only got me to <https://stakeholders.ofcom.org.uk/consultations/420-470-mhz/howtorespond/form/?itemid=1422792&action=submitform&lang=> with the cheeky comment at the bottom "Submit the form properly please!", with no boxes to fill in or anything.]

So here's what I tried to send:

Your details

Title Mr.

Forename J. P.

Surname* Gilliver

Representing* Self

Email* john.gilliver@baesystems.com

nothing confidential, OfCom may publish, I've read the declaration.

Additional comments (why do you always put this box at the _beginning_ of the consultation? I'd have thought at the end would be more appropriate!):

(In common with many OfCom documents, there is somewhat excessive use of abbreviations, after defining them once; this makes the document rather hard to read: more frequent repetition of the full phrase would in many cases not have excessively enlarged the document. "LTE" being a particular example here.) \\ Though not strictly part of 420-470MHz consideration, interference to the adjacent television band (which is currently being steadily reduced), especially to equipment still relatively recently purchased (5-10 years) in the mind of certain classes of consumers (FreeView boxes and sets), should I think be given slightly more attention.

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The almost throwaway intention to attack the amateur allocation (3.44 last point) is worrying: for various historical and technological reasons amateur equipment for this band has often been expensive, and thus represents significant outlay for participants.

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The band _does_ indeed seem to have a very complex usage pattern at the moment; its

rationalisation _does_ seem desirable.

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While international harmonisation is always desirable, and should still be kept in mind, the propagation characteristics of this band are such that _at the powers (and aerial gains) involved_, as opposed to broadcast use, the potential for interference both from and to adjacent countries is fairly low, except perhaps in parts of eastern England: even under unusual conditions, such signals are/were usually only received by broadcast enthusiasts (when the band was still used for broadcasting) and amateurs with high-gain aerials. (I do however accept that increased foreign use _may_ change this situation, if sufficient power and aerial gain is involved.)

Q1:

The conclusions seem reasonable.

Q2:

The conclusions seem reasonable.

Q3:

I have no view. Though I am puzzled by "adding the 450 MHz frequency will typically result in a 1dB performance loss to handsets" (4.15): this seems an odd statement - I presume it means "in other bands", and although I can see it adding to the _cost_ of any such handsets, I can't see why it should affect their performance on other bands. (Perhaps the statement needs recasting to clarify its meaning.)

Q4:

(Not a user of the band.)

Q5:

I was surprised to see _mentioned_ (3.29) that "There was little appetite for any reconfiguration within the band from incumbent licensees." While the _fact_ does not surprise me at all (no-one likes change, at least where it involves them in costs for no perceived benefit _to them_), the _mention_ of this fact seems at odds with recent OfCom decisions, particularly in the changes of use to the 800 and now 700 MHz bands. Since incumbent licencees' views in those bands did not seem to hold great sway, I don't see why similar parties' views should in the 420-470 band.

Q6:

It is not clear to me, from 4.23 and '4, what solutions Aegis _are_ proposing; they "suggest [Ofcom should] examin]ing[options", but I saw no actual proposed _solutions_ in those sections.

\\

In 4.25 (which comes _after_ Question 6 is posed), they consider it _is_ necessary for OfCom to intervene to reconfigure the band, which I suspect _is_ necessary. (But isn't that what we're discussing anyway?)

Q7:

Ideally, defragmentation would be achieved by a gradual withdrawal of licences prior to reorganisation; however, in view of the demand for the facilities available by use of the band, this is unlikely to happen. Unfortunately I have no (other) solution to offer!

Q8:

It appears a sound programme of work.

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The only slight reservation I have is about the statement that "there is limited evidence of demand for ... services in the band ... as a means to improve rural coverage." While perhaps true, this is presumably influenced by factors such as economic returns under the current situation; were regulations to change, such as for example were a government initiative to improve rural broadband access to consider releasing parts of this [or any other!] band for the purpose at advantageous rates and with time guarantees, then demand could suddenly be quite large.

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