

Cover sheet for response to an Ofcom consultation or call for inputs

BASIC DETAILS

Consultation title): Call for Inputs: Strategic Review of UHF Spectrum at 420-470 MHz (UHF bands 1 and 2)

To (Ofcom contact): Kevin Delaney

Name of respondent: Linda Cox

Representing (self or organisation/s): Pagers Direct

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 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If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the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.

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Name:

Signed (if hard copy):

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?

We agree with the conclusions on congestion within the Aegis Report. We are experiencing very little congestion in any other parts of the country although they all experience some other types of co-channel interference that are not related to congestion.

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?

We agree with the Aegis conclusions regarding the increase in future demand for radio spectrum. However, whether this demand should be satisfied by providing spectrum in the 420-470 MHz band is another matter completely.

For instance, if the utilities require an estimated 2 by 3 MHz then Ofcom should supply this outside of the already congested UHF band, perhaps in the 700MHz band. The commercial and technical arguments for using 420 - 470 MHz should not be a consideration as these apply to every user and supplier in the band. The same can be said for wideband BR applications or any other technical proposals unless they can be shown to relieve pressure on other parts of the band.

The Emergency Services should be encouraged to leave the 420 - 470 MHz band and thus free up some spectrum. Let us hope that the replacement ES network enables this to happen. In no circumstances should they be allowed another 1.3 MHz in the band.

IoT and M2M will obviously increase demand but much of this can be satisfied on WiFi or on cellular. If not then they should be allocated spectrum in a less used band such as VHF. We look forward to the outcome of the CFI from 2014.

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.

We agree with this conclusion and so we would like Ofcom to state that there will be no wideband provision in the 420-470 MHz band in the foreseeable future.

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?

No!.

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.

We would like to see a very serious attempt to try to relieve some of the overcrowding pressures in this band.

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.

It is our view that a mix of the suggestions made by Aegis is probably the most advantageous approach, including migrating incumbent “temporary” users (PMSE, cranes, construction etc.) to new bands or managed networks; pricing in and around London, transmitter power restrictions and perhaps others.

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?

It appears that the programme is well thought through but we would like to see some specific targets in the final report. Hopefully this work will lead to a better understanding of the scale of the congestion and interference problems which is great. However, we will be looking for what we can do next in order to alleviate the problems and we hope that this work will indicate the best way forward on this.