

## Response to Consultation Question:

Question 4.1: Do you agree with our proposal to conduct a market led award through an auction process for licensed use of the 2.3 and 3.4 GHz bands? If not, please provide evidence to counter this proposal.

No

The conditions laid out in the consultation are inadequate to safe guard users of the 2400 and 2483.5 MHz band, these consist of very large numbers of domestic and commercial uses who will be impacted. Whilst welcoming the 10Mhz guard band, reduced power should be implemented in the top 3 channels plus implementation of the reduction in out of band emissions of 15-20 dB as identified in: ***Liaison Statement to ETSI TC ERM on Unwanted emission of mobile terminals in the SRD band 863-870 MHz dated 14 march 2014 and the Input contribution from the administrations of Germany, France, United Kingdom and Sweden to ETSI MSG, ETSI ERM and JWG DD of May 2014***

Question 6.3: Do you agree with our assessment of the available options for mitigation of interference to home networks?

No

In the case of ALD equipment used for TV-hearing aid link the link budgets are much smaller, therefore LTE equipment “passing bye” or in adjacent premises are liable to cause interference. This is an infringement of The UN Human Rights Convention 1976, The European rights of The Child 1989, The Disability Act 2010, as it fails to address the needs of individuals both adults and children, who use hearing aids and radio amplification.

Question 6.6: Do you agree with our conclusion that the impact to Wi-Fi is not of a significant nature and therefore no regulatory intervention is necessary? If not, can you provide evidence?

No

In the case of the various forms of ALD this has not yet been tested and any interference into an ALD is “significant” and frightening. See 6.3

Question 7.1: Do you agree that we do not need to perform technical analysis on the applications in the middle of the band as set out in paragraph 7.7?

No

See answer to Question 6.3 and 6.6

Question 7.2: Do you agree with our technical analysis in relation to Bluetooth devices operating in the 2.4 GHz band, and that no additional restrictions are required in order to protect these applications?

No

See answer to Question 6.3 and 6.6

Question 7.5: Do you agree with our technical analysis in relation to radio microphones devices operating in the 2.4 GHz band and that no additional restrictions are required in order to protect these applications?

No

These can also be part of an ALD system and have not yet been tested. The English government introduced The Newborn Hearing Screening Programme, nationally in 2006 to ensure deaf infants were identified very early and provided with appropriate amplification. Such intervention is linked with improved linguistic outcomes. Any interference with the quality of the auditory signal compromises this already vulnerable group.

Question 7.6: Do you agree with our technical analysis in relation to short range devices operating in the 2.4 GHz band and that no additional restrictions are required in order to protect these applications?

No

Devices working with ALD have not yet been tested see 7.5

Question 7.9: Do you agree with our technical analysis in relation to hearing aids and assisted listening devices operating in the 2.4 GHz band and that no additional restrictions are required in order to protect these applications?

No

Further testing and restrictions detailed in question 4.1 are required to provide evidence before additional restrictions are rejected

Question 13.8: Do you agree with our proposed maximum in band power limit for user terminals in the 2.3 GHz band?

No

These should be lower in the top three channels and the restrictions identified in Question 4.1 implemented in any licence conditions

A similar response to this was received from the following list of stakeholders:

Adlard Ms J  
Albert Mr C  
Allen Ms F  
Allen Ms P  
Atkin Ms M  
Baker Ms A  
Barth Ms H  
Beeton Ms V  
Bell Ms M – Phonak Hearing Systems  
Blackie Ms J  
Blatchford Ms L  
Blocksidge Ms S  
Borders Mr A  
Bowyer Mr T  
Bradley Ms M  
British Assoc of Educational Audiologists  
British Assoc of Teachers  
British assoc of Teachers of the Deaf  
Brown Ms N  
Burke Mr P  
Byrne Ms J  
Camenisch Mrs A  
Carter Ms B  
Cartwright Mr C  
Casula Ms F  
Chalmers Mr A  
Champney Ms L  
Christopher Ms M  
Clarke Ms A  
Clegg Ms G  
Clinch Ms K  
Cohen J  
Coles Ms G  
Collins Ms M  
Conneans Ltd  
Conyers Ms D  
Davies-Phillips Ms J  
Devine Ms A  
Dillon Ms K  
Ditchfield Ms G  
Dolan Ms M  
Downes Ms Y  
Downie Ms J – Phonak Hearing Systems  
Durbridge Ms S  
Egerton Ms H  
Elliston Ms J

England Ms R  
Ereaut Ms N  
Ewing Foundation for Deaf Children  
Fielding Ms C  
Finestone Ms C  
Finlayson Ms M  
Ford Ms M  
Fox L  
Garner Dr M  
Gillson Ms S  
Gower Ms E  
Grant Ms W  
Gray Mr A  
Gray Ms C  
Gray Ms S  
Gregory-Jones ms D  
Hadwen-Wright Ms H  
Hall Ms N  
Harris Ms T  
Herring Ms S  
Higham Mr F  
Hilton Mr G – Phonak Hearing Systems  
Hladun Ms J  
Holer Miss P  
Hurley Mr S  
Hutchinson Ms E  
Hutson Ms J  
Inscoe Ms J  
Ivimey Mr A  
Jagdeo Mr S  
Jenkins Ms E  
Johnson Ms J  
Johnston Ms M  
Jones Mr C  
Jones Ms L  
Kavanagh Mr M – Phonak Hearing Systems  
King Mr A  
Kluk-de-Kart Dr K  
Lloyd J  
Lorimer Mr G – Phonak Hearing Systems  
Lumley Ms J  
Lundberg Ms H  
MacDonald Ms F  
Mager ms L  
Maher Ms E  
Maley Ms L  
Malloy ms S  
Manning Ms J

Mansbridge Ms G  
Manthorpe Mr P  
Marsh Ms R  
Marshall Ms E  
Matthews Ms S  
McCaffrey Mr D  
McCarthy Ms R  
McCracken Dr W  
McDermott Ms L  
McDermott Ms L  
McGee Mrs S  
McGuigan Ms L  
Medina Ms N  
Miller Dr L  
Miller Ms B  
Mitchell Ms K  
Murphy Mr T – Phonak Hearing Systems  
Naylor Ms M  
Neath Port Talbot County Borough Council  
Nsoatabe Ms S  
O'Neill Ms R  
Pennington Ms D  
Perry Ms J  
Philpott Ms S  
Rayner Ms E  
Reed Ms S  
Roe J  
Rowley Ms K  
Saks Ms J  
Scottish Council on Deafness  
Sewell Ms P  
Sheratte Ms F  
Sherratt Me A  
Slawson Ms K  
Smith Dr M  
Smith Mrs K  
Statham Ms C  
Stevenson Ms S  
Stocks Ms K  
Stratham Mr R  
Streatfield Ms N  
Support Service Trafford Sensory Impairment  
Sutherland Ms H  
Taylor Ms L  
Tennent Ms M  
Thomas Mrs S  
Touye Ms M  
Tudor Ms D

UK Childrens FM Working Group  
University of Manchester & Ewing Foundation Charity  
Vout Ms L  
Wadsworth Ms S  
Walker Ms A  
Walker Ms U  
Wallace Ms K  
Watson Ms J  
Wells Ms K  
Weston Ms G  
Weston Ms H  
Whitehouse Ms H  
Wilding Ms G  
Wilkinson Ms M  
Williams Mr D  
Williams Ms C  
Willoughby Ms J