



# **Proposals to amend the authorisation conditions for the use of certain Short-Range Devices**

Proposed changes to technical conditions

BT's response to the consultation published on 9 May 2022

Issue: v1.0

Date: 30 June 2022

## 1 Introduction

This document provides BT's comments on Ofcom's consultation document<sup>1</sup> on proposed changes to regulations relating to Short Range Devices.

BT is generally supportive of the proposals made within the consultation document. We only have a few observations to make, as set out below, which we hope may be useful to Ofcom and will be taken into account when finalising the changes to the relevant regulations.

## 2 Response to consultation questions

### **Question 1: Do you agree with our proposal to extend safety related ITS by 20 MHz from 5905 MHz to 5925 MHz?**

No comments

### **Question 2: Do you agree with our proposal to permit outdoor mobile/nomadic use of 5150 to 5250 MHz and airborne use in 5170 to 5250 MHz band for WAS/RLAN applications, as well as our proposal to clarify the DFS and TPC requirement in the 5250 to 5350 MHz band?**

Yes, we agree.

We have the following observations on the draft update to the IR 2030 document:

#### IR2030/7/6

The statements that "Airborne or outdoor use is not permitted" and "25mW for Very Low Power indoor and mobile Outdoor" are contradictory.

#### IR2030/8/1a

The statements that "Airborne use outside of an aircraft is only permitted in 5170 – 5250 MHz." and "The apparatus may only be used within a building or aircraft or any other enclosed space with attenuation characteristics..." are contradictory. We suggest to preface the second sentence with exception along the lines of:

"Except for air airborne use outside of an aircraft, which is permitted only in 5170-5250MHz, the apparatus may only be used within a building or aircraft..."

As a final point on the IR2030, we note there are several references to "the notice of publication". We suggest a clear reference is provided to what this document is and where it can be found.

### **Question 3: Do you agree with our proposal to liberalise some of the technical conditions in some UWB devices?**

No comments.

### **Question 4: Do you agree with our proposal to close the 24 GHz SRR band to new applications?**

No comments.

### **Question 5: Do you agree with our proposal to make some technical and minor editorial changes to SRD applications in the 870/915 MHz bands?**

No comments.

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<sup>1</sup> [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0019/237214/srd-policy-condoc.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0019/237214/srd-policy-condoc.pdf)

