

Question 1:Do you agree with our proposal to exempt the land use of 406 MHz PLBs from the need to hold a Wireless Telegraphy Act licence?:

no comment

Question 2:Do you agree with our proposal to exempt the use equipment for safety-related ITS infrastructure from the need to hold a Wireless Telegraphy Act licence?:

no comment

Question 3:Do you agree with our proposal to exempt the use of terminals operating in the 3400 to 3800 MHz band from the need to hold a Wireless Telegraphy Act licence?:

no comment

Question 4:Do you agree with our proposals for the authorisation of 2 GHz MSS user terminals from licensing?:

no comment

Question 5:Do you agree with our proposal to exempt the use of terminals forming part of the Apollo network by a network station user exemption?:

no comment

Question 6:Do you agree with our proposed changes to the current exemption regulations to permit use of non-specific SRDs at 138.2 to 138.45 MHz?:

We welcome the proposal to open the 138.2 to 138.45MHz band for use by non-specific SRD's according to the ERC recommendation 70-03 and as laid out in IR2030/1/26.

The requirements of EN54-25 (Radio components of fire alarm systems) to use a frequency band with a duty cycle limit of 1% or less prevents the use of existing SRD channels at VHF. While there are bands provided at UHF (868MHz), using these channels results a reduction in propagation in fixed building situations and also a significant increase in power consumption to operate the same class of receiver.

It is also worth noting that this band has already been opened by 15 of the 31 EU/EFTA countries.