

Your response

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| <p>Question 1: Do you agree with our proposals to extend the licence exemption relating to mobile terminals connecting to an MCA to include 5G devices? Please give reasons and provide evidence that supports your comments on the proposals.</p> | <p>Confidential? – N</p> <p>No comment - under the remit of CAA.</p> |
| <p>Question 2: Do you agree with our proposals to extend the licence exemption relating to mobile terminals connecting to an MCV to include 5G terminals? Please give reasons and provide evidence that supports your comments on the proposals.</p> | <p>Confidential? – N</p> <p>As regards avoiding any disturbance to the radiocommunication and radionavigation systems serving the safety of seafarers and the safe navigation of ships, the extension of the licence exemption for personal mobile terminals to cover 5G connectivity is acceptable for equipment that operates and conforms with the conditions set under Table 2.</p> <p>However, despite the operation of 5G equipment being barred under these conditions when closer than 4 nautical miles (NM) from coast baselines, and restricted to internal shipboard operation while less than 12 NM miles from baselines, some administrations not party to the EU and CEPT arrangements, may still consider that use of personal mobile communications though onboard systems within their territorial sea (usually out to 12 NM from baselines) amounts to interfering with the operation of their national mobile communication systems (see UNCLOS Article 19k). This would be on account of revenue being diverted from their appointed telecommunication service providers - a position that could expose passengers, crew and ship owners to penalties.</p> <p>Guidance needs to be developed that identifies any administrations that places such restrictions on the use of personal mobile communications throughout their territorial sea.</p> |
| <p>Question 3: Do you agree with our proposals to introduce new licence exemptions for (i) Indoor Security Scanners and (ii) Audio PMSE devices?</p> | <p>Confidential? – N</p> <p>No comment - not considered to pose a risk of disturbance to the radiocommunication and radionavigation</p> |

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| Please give reasons and provide evidence that supports your comments on the proposals. | systems serving the safety of seafarers and the safe navigation of ships on account of the frequency ranges and powers set in Tables 3 and 4. |
| <p>Question 4: Do you agree with our proposals to amend the technical conditions for various SRDs as set out in this document? Please give reasons and provide evidence that supports your comments on the proposals.</p> | <p>Confidential? – N</p> <p>The proposals are only acceptable if there is certainty that the published conditions of use are applied and maintained through equipment standards, certification and marking to show conformance with applicable standards, followed up by effective market surveillance. For example, technical conditions for inductive RFID devices operating in the frequency range 400-600 kHz are set out in Table 5. Since this frequency range covers the provision of maritime safety information on 490, 500 and 518 kHz, via NAVTEX and NAVDAT, effective regimes for equipment certification and market surveillance need to be in place in order to prevent devices operating at higher powers being placed on the market.</p> |
| <p>Question 5: Do you have any additional comments on our proposed changes to the licence exemption for SRD equipment?</p> | <p>Confidential? – N</p> <p>Although not an obvious consideration with respect to the proposals presented in this consultation, it is the case that the regime for SRD devices defines such to operate at "low power", even though no definite overall limit is defined for the descriptor "low". The current work on the revision of the EU Decision 2006/771/EC has not (so far) altered the explanation that "<i>short-range device</i>' means radio transmitters which provide either unidirectional or bidirectional communication and which transmit over a short distance at low power." However, CEPT has already accepted in ECC Report 333 that Wireless Power Transmission devices operating up to 30 W can be treated as licence-exempt SRDs. In order to avoid doubt and confusion, an overarching definition of "low power" is needed for SRDs and other licence-exempt devices, noting that radio amateurs need licences for transmitters operating at less than 30 W.</p> |
| <p>Question 6: Do you agree with our proposal to introduce new licence exemptions for Radiodetermination, Lo-</p> | <p>Confidential? – N</p> <p>No comment in relation to applications operating in the precise frequency range 6-8.5 GHz, as not considered to pose a risk of disturbance to the radiocommunication</p> |

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| <p>cation Tracking, Tracing and Data Acquisition, Vehicle applications and High Power Indoor-only applications in the 6-8.5 GHz band? Please give reasons and provide evidence that supports your comments on the proposals.</p> | <p>and radionavigation systems serving the safety of seafarers and the safe navigation of ships on account of the frequency ranges and powers set in Tables 11 and 13. Indeed such applications could be useful for cargo handling in ports and onboard ships. In particular, applications intended for precise location and positioning functions are designed to operate seamlessly with coarser information derived from GNSS systems, which is considered to be a welcome demonstration of compatibility with GNSS reception.</p> <p>However, it is noted that Table 12 sets conditions for UWB applications operating above and below the 6-8.5 GHz range, which would overlap S-band and X-band radar. The consultation is not clear then in defining the frequency ranges that will or will not be the subject of licence exemptions. Moreover, it is not clear whether this part of the consultation is intended to apply to, or to invite responses on frequency ranges outside 6-8.5 GHz.</p> |
| <p>Question 7: Do you agree with our proposal to amend the existing licence exemption for generic UWB devices to make clear that the use of UWB in an aircraft, road vehicle or a train are not in scope of the exemption? Please give reasons and provide evidence that supports your comments on the proposals.</p> | <p>Confidential? – N</p> <p>Neither the consultation document nor CEPT Report 84 elaborate on the reasons for not maintaining the existing licence exemption for the use of generic UWB devices on aircraft, road vehicles or on trains that is found at A1.1 of Annex A to the consultation document. Moreover, the Table at A1.1 covers a much wider frequency range than 6-8.5 GHz, again including S-band and X-band radar.</p> <p>It is not clear then whether the limitation of the previous exemption applies just to the 6-8.5 GHz range or extends over the complete range covered by the A1.1 Table 1.</p> <p>In the absence of further information on the reasons for taking some generic UWB devices out of the licence-exempt category, the change is supported and, in consequence, it is requested to take the use of such UWB devices on board ships also out of the scope of the exemption.</p> |
| <p>Question 8: Do you have any additional comments on our proposed changes to the licence exemption for UWB equipment?</p> | <p>Confidential? – N</p> <p>As noted for Q7 and Q8 above, the proposals are not clear in respect of whether the proposals for bringing more UWB applications into the scope of exemption and</p> |

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| | <p>taking some out apply just to the 6-8.5 GHz range or wider. Clarification is needed then to see if potential impacts on S-band and X-band radar need to be considered in the case that the proposals refer to a wider frequency range than 6-8.5 GHz.</p> |
| <p>Question 9: Do you agree with our proposals to introduce a new licence-exemption for Group B AMRDs in Channel 2006? Please give reasons and provide evidence that supports your comments on the proposals.</p> | <p>Confidential? – N</p> <p>A licence exemption could only be introduced for Group B AMRD devices if there is a guarantee that an effective regime of market surveillance will be in place and maintained, so as to prevent devices coming to market under the Group B category that exceed the power limitation, or falsely represent their capabilities, or both.</p> <p>Group B devices shall not be used for man over board (MOB) purposes. Any that are brought to market will pose a serious risk to life.</p> <p>We feel that the information provided at section 6 has some inconsistencies when explaining AMRD usage. Although para. 6.2 does describe the present situation correctly, the reference to current regulations given at para. 6.5 is wrongly attributed to Report ITU-R 2231-1. This is mistaken: ITU-R Reports are of an informative nature and do not provide regulatory direction; moreover, the Report is dated November 2014, very much before the recent changes on AMRD use considered at WRC-19. The correct references should be to footnote <i>r</i>) to Appendix 18 of the ITU-R Radio Regulations and Recommendation ITU-R M.2135.</p> <p>Also, the target of the statement that “<i>This is the only system for distress, emergency, and safety communication for general shipping</i>” is not clear. It surely means the GMDSS as a whole, since the distress and safety uses of Group A AMRD devices are limited precisely to <i>man-overboard</i> incidents and <i>Mobile Aids to Navigation</i>. This poor wording could be misleading.</p> <p>In contrast, the use of AMRD devices under this consultation is limited to Group B devices. Recent decisions of the ITU and IMO confirm that Group B devices are not intended to enhance the safety of navigation, as per para. 6.2, and are therefore definitely excluded from providing any alerting function. However, this is somewhat complicated in that, although the changes introduced by the Appendix 18 footnote <i>r</i>) at WRC-19 primarily restrict AMRD Group B to using Appendix 18 channel 2006 (160.9 MHz) only, and limit messaging to information of</p> |

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| | <p>a situational awareness nature over very short distances, channel 2006 may also be used for experimental use, which could included testing of man-overboard functions.</p> <p>With that clarification on the capabilities of Group B AMRD devices and the consequential conditions on power and deployment given at Table 14, MCA can give due consideration to the proposal for licence exemption.</p> <p>The use cases envisaged for Group B devices include the special interest activities of personnel in the maritime environment, such as offshore workers, fishermen, divers, and windsurfers. Gathering information on such activities is certainly useful and does have a safety dimension. It is therefore important to note that the specification for Group B messages includes provision for unique identification as being necessary for the user and the supervising system to identify and locate transmitting devices and resolve any interference issues arising form multiple transmissions.</p> <p>This does, however, present a risk that Group B devices will be brought to market purporting to offer emergency alerting functions and protection as a cheap alternative to Group A devices, perhaps under the guise of experimental use. Such misuse would give a false sense of security and could lead to personnel getting into hazardous situations.</p> <p>Given that the specification for Group B devices includes provision for unique device identifications (see Annexes 4 & 5 of Recommendation M.2135) MCA concludes that the discipline of individual licensing will serve to guard against misuse of AMRD functions and is required since many of the use cases envisaged make it essential to know the location of Group B devices, especially when linked to personnel. This will ensure that user identification and contact details are available and should apply to all AMRD devices.</p> |
| <p>Question 10: Do you agree with our proposals to introduce a new licence exemption for very low power maritime radios operating in an on-land training setting to be made licence-exempt? Please give reasons and provide evidence that supports your comments on the proposals.</p> | <p>Confidential? – N</p> <p>This proposal is supported. The proposal will allow for a more realistic training environment and is welcomed.</p> |

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| <p>Question 11: Do you agree with our proposals to extend the existing licence exemption for testing and development under suppressed radiation conditions? Please give reasons and provide evidence that supports your comments on the proposals.</p> | <p>Confidential? – N</p> <p>No objection to the extension of the frequency list up to 275 GHz as per Table 18, and welcome the explicit identification of non-permitted frequencies to the list. In particular, the exclusion of the band 1400-1427 MHz is essential for avoiding degradation in the observations of earth exploration satellites, as these contribute to long-term climate studies along with greater accuracy in weather forecasting and thereby serve to improve the quality of maritime safety information broadcasts.</p> <p>However, with non-permitted frequencies now shown explicitly, we request that the starred GMDSS frequencies above 30 MHz shown in Appendix 15 of the Radio Regulations be added to this list.</p> <p>On a point of accuracy one example of how to qualify as "suppressed radiation" is given as conducting tests within an anechoic chamber. However, such use should result in much lower signal levels. Perhaps an alternate list should be added based on typical performance of characteristics of Faraday cages and other types of enclosed test chambers.</p> |
| <p>Question 12: Do you agree with our proposals to extend the application of Regulation 7 of the 1989 Regulations i.e. that equipment users must conduct measurements to ensure that their equipment does not exceed the limits on spurious emissions, to anyone relying on the proposed exemption in the additional bands. Please give reasons and provide evidence that supports your comments on the proposals.</p> | <p>Confidential? – N</p> <p>This is supported as there are doubts on how effective certification and market surveillance are in meeting limits on disturbances and unwanted emissions. In any case, limits on unwanted emissions are set in recognition that there are technological factors that limit what can be achieved with practical transmitters, and that adherence to limits on unwanted emissions will not, on their own, prevent interference in all circumstances.</p> |
| <p>Question 13: Do you have any other comments on our proposals to make amendments to the licence exemptions for this testing equipment?</p> | <p>Confidential? – N</p> <p>No further comment regarding test equipment.</p> |

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| <p>Question 14: Do you agree with our proposals to extend the existing exemption for radio equipment operated by visiting amateur radio users, to cover use by those on short visits from countries with which we have bilateral reciprocal licensing agreements?</p> | <p>Confidential? – N</p> <p>No comment of a technical nature as this is not considered to have any adverse impact on the radiocommunication and radionavigation systems serving the safety of seafarers and the safe navigation of ships.</p> <p>However, the change is considered useful for prompting an interest in radiocommunications for those who might come to consider taking up a role in seafaring.</p> |
| <p>Question 15: Do you agree with our proposals to define a temporary visit as a maximum period of three months? Please give reasons and provide evidence that supports your comments on the proposals.</p> | <p>Confidential? – N</p> <p>No comment.</p> |
| <p>Question 16: Do you agree with our proposal to introduce a new licence exemption for Fixed Wireless Access equipment operating in the 5725-5850 MHz band? Please give reasons and provide evidence that supports your comments on the proposals.</p> | <p>Confidential? – N</p> <p>No comment - under the remit of MoD as regards any adverse impact on military radar use.</p> |

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