

Your response

Question	Your response
<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>Nothing to add.</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>Nothing to add.</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? Please give reasons and provide evidence that supports your comments on the proposals.</p>	<p>Shure would like to thank Ofcom for the opportunity to comment on its proposals. Our comments are limited to the proposals to introduce new licence exemptions for audio PMSE devices operating in the bands 821.5 – 832 MHz, and 1785 – 1804.8 MHz (consultation s.4.11 – 4.17).</p> <p>Shure is broadly supportive of the proposal. Both frequency bands were added to the ‘UHF Shared’ audio PMSE licence product in March 2015, in accordance with Commission Implementing Decision 2014/641 (since repealed by the recent Implementing Decision 2025/105).</p> <p>In general terms, the UHF shared licence permits a licensee to use any one of several frequency bands or spot frequencies listed in the licence, in any UK location not subject to geographical restriction. Other PMSE users with the same licence product in the same vicinity are expected to coordinate amongst themselves to mitigate interference. Consequently, whether licensed as currently, or exempted from licensing, there is no material difference to the interference risk. The probability of encountering another co-channel user is the same, and in both licensed and licence exempt scenarios neither user has priority.</p> <p>We therefore agree with Ofcom’s proposals that exemption of those two bands is a proportionate action and</p>

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	<p>satisfies the conditions laid down in s.8(5) of the WTA 2006.</p> <p>We raise two additional points for Ofcom’s consideration. The first is that Ofcom references two CEPT publications: Report 85, and ERC Recommendation 70-03. In Ofcom’s proposals and in Report 85 the band is listed as 1785 – 1804.8 MHz, whereas in ERC Recommendation 70-03 (mirrored in ERC Recommendation 25-10) the band is listed as 1785 – 1805 MHz following coordinated work between SRD/MG and FM51 to simplify some of the related technical conditions. It is a minor inconsistency but if the intention is closer alignment with the Recommendations, the exempted band should be 1785 – 1805 MHz.</p> <p>The second point is that the use of 1785 – 1805 MHz for audio PMSE under the current licensing regime is prohibited in Northern Ireland. Shure would welcome clarity from Ofcom on the current use of the band in Northern Ireland, especially whether, in its view, Ofcom believes the restriction could be lifted. We do not believe that a continuing prohibition on use there should stand in the way of the broader exemption measures proposed. Our intention is just to highlight that any Licence Exemption Regulations made would need to account for the prevailing use of the band in Northern Ireland.</p> <p>We’d once again like to thank Ofcom for the opportunity to respond and we remain available to further discuss any of the points raised above.</p>
<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>Please see response to Q.3, above.</p>
<p>Question 5: Do you have any additional comments on our proposed changes to the licence exemption for SRD equipment?</p>	<p>Please see response to Q.3, above.</p>

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<p>Question 6: Do you agree with our proposal to introduce new licence exemptions for Radiodetermination, Location 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>Nothing to add.</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>Nothing to add.</p>
<p>Question 8: Do you have any additional comments on our proposed changes to the licence exemption for UWB equipment?</p>	<p>Nothing to add.</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>Nothing to add.</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>Nothing to add.</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>Nothing to add.</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>Nothing to add.</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>Nothing to add.</p>
<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>Nothing to add.</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>Nothing to add.</p>

Question	Your response
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.	Nothing to add.

Please complete this form in full and return to regulations@ofcom.org.uk