Your response

Question	Your response
Question 1: Do you agree with our analysis of potential demand for the 1900 MHz band? Are you aware of any other potential demand for this spectrum, including any demand specific to Northern Ireland?	As Ofcom notes in paragraph 3.12(c), there is ongoing work in CEPT (WG SE, assigned to Project Team SE7) to assess existing coexistence studies that have looked at the feasibility of DECT operating in the 1910-1920 MHz band. It will also provide an opinion on a possible new entry in Annex 3 of ERC Recommendation 70-03 for DECT-based devices. The relevant studies are: • ECC Reports 332 and 352 which conclude that UAS use based on DECT-2020 NR in 1910-1920 MHz is feasible considering MFCN above 1920 MHz and FRMCS below 1910 MHz. • ECC Report 314 which concludes that DECT (in 1880-1900 MHz) is compatible with FRMCS operating in 1900-1910 MHz (and therefore reasonable to assume that DECT operating above 1910 MHz would also be compatible with FRMCS). • ECC Report 220 which includes sharing studies on DECT in the 1900-1920 MHz band. The report concludes that DECT operating across the band is feasible considering MFCN base stations above 1920 MHz. Shure is one of many manufacturers comprising the DECT Forum and has supported DECT Forum's input submissions to CEPT, namely that the studies noted above show that use of the 1910-1920 MHz band is compatible with FRMCS and MFCN and no further studies are required (please see DECT Forum input papers SE7(25)008 and FM(25)032). We encourage Ofcom in its assessment to fully consider the potential offered by DECT's operation in the 1910 – 1920 MHz band.
Question 2: Do you agree with our identification of FRMCS as the optimal use of the 1900–1910 MHz spectrum?	No comment.
Question 3: Do you agree with our identification of ESN Gateways as the optimal use of the 1910–1915 MHz spectrum in Great Britain? Do you agree that it is too early to identify an optimal use of the 1910–1915 MHz	We recognise the public safety benefits of the ESN Gateways, as Ofcom has set out. However, optimal use of spectrum is a more complicated assessment. One of many factors is the potential for use by alternative services, such as DECT (please also see our responses to Q.4 and Q.12, below). In paragraph 3.23, Ofcom states that,

Question	Your response
spectrum in Northern Ireland at present?	'demand for 1910 – 1915 MHz from these alternative uses is more uncertain than from ESN gateways…' In response, Shure notes that certainty of demand is inextricably linked to regulatory certainty and we would therefore encourage Ofcom to continue to engage with the work currently ongoing in CEPT and with the DECT Forum.
Question 4: Are you aware of any low power use cases suitable for the 1915–1920 MHz spectrum?	Yes. DECT is a low power use case and its potential use of the 1910 – 1920 MHz band is the subject of ongoing work in CEPT (see also response to Q.12, below).
Question 5: Do you have any comments on our proposed authorisation approach for FRMCS?	No comment.
Question 6: Do you have any views on our proposed non-technical conditions for the new FRMCS licence?	No comment.
Question 7: Do you have any views on our proposed licensing process for the FRMCS licence?	No comment.
Question 8: Do Are you aware of any uses that can coexist with FRMCS without creating a risk of harmful interference? If so, please provide evidence.	No comment.
Question 9: Do you agree with our proposed approach for authorising ESN gateways in 1910–1915 MHz?	No comment.
Question 10: Do you have any views on our proposed non-technical licence terms for the ESN gateways licence?	No comment.
Question 11: Do you have any views on our proposed licensing process for the ESN gateway licence?	No comment.

Question	Your response
Question 12: Are you aware of any uses that can coexist with ESN Gateways without causing risk of harmful interference? If so, please provide evidence.	There could be a considerable gap in time between the anticipated conclusion of the work in CEPT regarding DECT's operation in 1910-1920 MHz and the use of 1910 – 1915 MHz by ESN (notwithstanding the possibility of delays to ESN deployment). DECT applications are ideal potential users of the band. Use is predominantly indoor, with a typical range of 50m. Furthermore, DECT is designed to operate in a shared spectrum environment and utilise inherent spectrum management functionalities to minimise risks of interference with adjacent services (please see DECT Forum's input paper SE7(25)008 for more information). ESN use of the 1910-1915 MHz band, though potentially deployable anywhere at short notice, 'will be on an ad-hoc and temporary basis and confined to specific locations (i.e., where there is insufficient coverage from the ESN's main mobile network)' (Ofcom para. 3.22). That suggests that for large areas of the country and for large periods of time, the 1910-1915 MHz band will not be in use by ESN. Taken together with the proposal not to allocate the 1915-1920 MHz range, the implication is that Ofcom's proposed band plan in Figure 3.1 of the consultation does not lend itself to maximising spectrum utilisation in the range 1910-1920 MHz. To prevent unnecessary spectrum sterilisation and to maximise utilisation of the band, Shure encourages Ofcom to examine the feasibility of DECT's use of the 1910-1920 MHz band, to include an assessment of sharing between ESN and DECT in the 1910-1915 MHz band and of DECT's use of the 1915-1920 MHz range. As we note above, DECT is ideally suited to this spectrum and to minimising the risks of interference with adjacent services. Notwithstanding the ongoing work in CEPT, DECT's use of the entire 1910-1920 MHz band merits closer examination by Ofcom.
Question 13: Do you have any comments on our assessment of the coexistence of FRMCS in 1900–1910 MHz with existing DECT and FDD uplinks?	No comment.

Question	Your response
Question 14: Do you have any comments on our assessment of the coexistence of ESN Gateways in 1910–1915 MHz with existing DECT and FDD uplinks?	No comment.
Question 15: Do you have any comments on our assessment of the coexistence of ESN Gateways in 1910–1915 MHz with FRMCS in 1900–1910 MHz?	No comment.
Question 16: Do you have any comments on the feasibility of the additional mitigation measures we have identified, or additional suggestions for measures that could further reduce the likelihood and/or impact of interference?	No comment.
Question 17: Do you have any comments on our proposed technical licence conditions for FRMCS and ESN gateways?	No comment.
Question 18: Do you agree with our provisional conclusion that there is likely to be excess demand for the 1900–1915 MHz band, in future, if cost-based fees were applied; and, therefore, that an AIP fee is appropriate? Please provide any evidence to support your position.	No comment.
Question 19: Do you agree with our approach to fees, including fee level and adjustments? Please provide any evidence to support your position.	No comment.

Please complete this form in full and return to 1900futureuse@ofcom.org.uk.