The FCS represents companies which provide professional communications solutions to business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest private enterprises and public sector users. FCS is the largest trade organisation in the professional communications arena, representing the interests of circa 350 businesses which supply B2B services nationwide.

The FCS welcomes the opening of radio spectrum providing new opportunities to add value and to contribute to growth. We note that the bands recently developed under the sharing policy and the bands currently under consideration may well promote the deployment of significant new operational capability as well as consumer benefits. However, we note that significantly increasing the number of units that are in operation in any spectrum band and in proximity to each other may increase the potential for Harmful Interference to occur. This is most undesirable as that could reduce the operational benefits and general growth that is achieved.

The FCS therefore recommends that increased care is taken when assigning spectrum in these bands so as to avoid such interference. Exactly this approach is proving successful in the deployment of SS-DAB into the new spectrum that has been made available.

We note that the interference may be as a result of several effects when in close physical proximity. It is not just as a result of receiver performance. Out of band (OOB) power emitted from one device may be on a channel for another device and so cannot be filtered out.