Title:

Mr

Forename:

Timothy

Surname:

Mayoh

Representing:

Self

Organisation (if applicable):

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1: Do you have any comments on the mechanism for UK preparation for WRC-15 and the role of Ofcom in this process?:

The best decider of the most economically efficient use of spectrum, whether for TV, mobile or otherwise is the market. Central planners at Ofcom lack price signals, and are vulnerable to lobbying by special interest groups who do not reflect the views of the population as a whole. The spectrum allocation should be decided through auction, and across all potential users of it rather than the use being predefined (i.e. for mobile).

Question 2: Do you agree with the prioritisation of the agenda items, as shown in Annex 6, and if not why?:

Question 3: Do you agree with Ofcom?s general approach on WRC-15 agenda item 1.1?:

Question 4: In view of the recent developments on the 1 492 - 1 518 MHz and 5 925 - 6 425 MHz bands, what are your views on the potential identification of these bands for IMT and/or RLAN and on the mobile data applications that could make use of them? How do you believe the sharing with the fixed service and the fixed satellite services could be managed at the national level?:

Mobile data should be prioritised within these bands.

Question 5: For the band 1 427 ? 1 452 MHz, do you agree that it is right to support the further consideration of the band, recognising the Ministry of Defence interest?:

Mobile data should be prioritised within these bands.

Question 6: For the band 1 452 ? 1 492 MHz, which is already subject to a harmonisation measure within CEPT, do you agree that this band be supported for an IMT identification at WRC-15?:

Yes

Question 7: Recognising the UK plans to release spectrum in the 3 400 ? 3 600 MHz band, coupled with the binding European Commission Decision (for electronic communications services) in the bands 3 400 ? 3 600 MHz and 3 600 ? 3800 MHz, do you agree that these bands should be supported for both a co-primary mobile allocation and IMT identification?:

Yes

Question 8: Noting that there are a number of countries that strongly oppose the inclusions of the 3 800 ? 4 200 MHz band, do you agree that we should support the longer term consideration of this band for potential mobile broadband use?:

Yes

Question 9: Noting that there is currently limited international support for a co-primary mobile allocation in the band 2 700 ? 2 900 MHz, do you think that we should continue to support this band at WRC-15?:

Yes

Question 10: Do you agree that the 5 350 ? 5 470 MHz and 5 725 ? 5 925 MHz bands could provide important additional capacity for Wi-Fi and similar systems? If so, and noting the need to protect both earth observation satellites and radar systems, do you agree that sharing solutions should be considered at WRC-15? :

Yes

Question 11: Do you agree that we should oppose a co-primary mobile allocation at WRC-15 for the band 470 ? 694 MHz?:

Absolutely not. As the only realistic channel for mobile data is terrestrial radio whilst TV broadcast is possible through cable and satellite additionally, mobile data should be given priority in the limited available spectrum. Mobile networks such as Three and O2 are so short on spectrum they are incapable of providing the same 20MHz LTE service as Vodafone and EE, resulting in greatly decreased competition in the market and growing congestion or further limiting of data allowances for users of the former networks. Mobile provides far greater economic benefits than TV through the vast possibilities for growth unlocked through the provision of fast data on the move to almost every business in the UK, while TV is generally a consumed residential service which produces little direct value in itself. Broadcasting of TV over LTE through multicast, as is being developed by several networks at present, is also more spectrum efficient than broadcast over traditional TV standards.

Question 12: Do you agree that the UK should continue to support harmonisation of 694 - 790 MHz for mobile broadband and an out-of-band emission limit for protection of DTT reception in an ITU R Recommendation, alongside an acknowledgement that 694 MHz should be the lower frequency boundary for the band?:

Mobile data should be prioritised within these bands. Out-of-band emission interference is a lesser issue than expected with modern technology, it should not be a priority. The lower boundary for the band should be as low as possible to increase spectrum available. For as long as teleshopping channels exist, TV has too much spectrum!

Question 13: Do you agree that any harmonisation measures for PPDR use should be sufficiently flexible to enable PPDR agencies to choose the most appropriate spectrum solutions nationally?:

Question 14: Do you have any comments on the potential use by the amateur service in the 5 250 to 5 450 kHz band?:

Question 15: Do you agree that if any allocations to the fixed satellite service in the 10-17 GHz range impose undue constraints on existing services then further studies on the demand and justification for use of the spectrum would need to be carried out?:

Question 16: Do you agree that the UK should support retaining the recognition for aeronautical radionavigation use, but equally support reviewing the limits associated with the FSS with a view to facilitating better use by the FSS?:

Question 17: Do you agree that the UK should support new primary allocations for the fixed-satellite service in the 7/8 GHz bands, with the proposed restrictions?:

Question 18: Do you agree that the UK should not support new allocations for the mobile satellite service in 22-26 GHz as they are not justified and that the focus should instead be upon the continued protection of the incumbent services?:

Question 19: What are your views on the use of FSS spectrum allocations for UAS, recognising the shared regulatory responsibility and the safety considerations for the control of unmanned aircraft?:

Question 20: Do you have any view on the need, or otherwise, to modify the restrictions that relate to the operation of ESVs in the bands 5 925 ? 6 425 MHz and 14-14.5 GHz?:

Question 21: What are your views on a potential new allocation to the maritime mobile satellite service, recognising the UK interest in the other services that make use of the bands under consideration?:

Question 22: Do you agree that the UK should not support a proposal for additional UHF spectrum for maritime on-board communications and that narrower channels will help to increase capacity?:

Question 23: What are your views on any necessary regulatory provisions for AIS in the bands already identified for maritime use?:

Question 24: Where the appropriate radio regulatory provisions are established for use in existing aviation related bands, do you agree that the UK should support regulatory conditions for the accommodation of WAIC applications?:

Question 25: Do you agree that the UK should support a generic radiolocation allocation in the 77.5-78 GHz band, where appropriate technical conditions are established?:

Question 26: Do you agree that the UK should support an allocation across the 7 190 ? 7 250 MHz band, dependent upon the outcome of technical studies?:

Question 27: Do you agree that is right to wait for the relevant sharing studies to mature before coming to a final position on the potential for additional allocations to the earth exploration-satellite (active) service in the 8/9/10 GHz band?:

Question 28: Do you agree that the UK should support the CEPT position that removes the distance limitation on space vehicles communicating with orbiting manned space vehicles, whilst retaining the pfd limit to protect terrestrial services?:

Question 29: Do you agree that the UK should support maintaining UTC as currently defined (i.e. with the inclusion of leap seconds) and that the UK should support further study around the concept of dissemination of two reference time scales?:

Question 30: Do you have any comments on the UK approach and positions on the elements of Agenda Item 7?:

Question 31: Do you agree that any potential regulatory constraints need to be fair and proportionate on both the Cospas-Sarsat operation and users in the adjacent band?:

Question 32: Do you have any comments on Agenda Item 9.1.2 concerning reduction of the satellite co-ordination arc?:

Question 33: Do you agree that the UK should oppose any proposal that aims at changing the provisions of the Radio Regulations in a way that gives inherent priority (i.e. coordination priority) to certain satellite systems over any other satellite system?:

Question 34: Do you have any comments on Agenda Item 9.1.4 relating to updating the RR for out of date or redundant material?:

Question 35: Do you have any view on the need, or otherwise, for additional international regulatory measures to support the use of earth stations for aeronautical and meteorological communications in the 3.4 ? 4.2 GHz band?:

Question 36: Do you agree that the UK should not support any change to the fixed and mobile definitions under Agenda Item 9.1.6?:

Question 37: Do you have any views on the CEPT position that no further work is required in respect of spectrum management guidelines for emergency and disaster relief radiocommunications?:

Question 38: Do you agree that no specific measures need to be introduced for nano and pico-satellites and that the current approach to their regulation is sufficient?:

Question 39: Do you agree that the UK should support the recent regulatory developments with respect to ESOMP operation, while continuing to monitor developments?:

Question 40: Do you have any comments on Agenda Item 9.3 considering Resolution 80?:

Question 41: Do you have any comments concerning the standing agenda items?:

Question 42: Do you have any comments regarding UK positions for future WRC agenda items?:

Question 43: Are there any other possible agenda items you wish to see addressed by future WRCs?:

Question 44: Are there particular frequency bands, above 6 GHz, that should be considered for technical study in relation to the potential future agenda item addressing IMT use?:

Yes