

## **Name Withheld 12**

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

I welcome the ability that Ofcom is providing, in preparation for the WRC-15, to make an individual contribution through the process.

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

Yes

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

Yes

### **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?:**

I think that the allocation of these bands for IMT and/or RLAN purposes would help alleviate bandwidth pressure, to such an extent as to reduce the demand to use more of the UK terrestrial DTV for such purposes. I do not believe that it is desirable that sharing with fixed (terrestrial) services and fixed satellite services should be managed at national level - It needs to be a coordinated international effort and agreement, to ensure that all stakeholders (broadcasters, equipment manufacturers and consumers) benefit and that there is harmonisation of both broadcast and reception equipment with existing adjacent 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?:**

I think that it is right to support further consideration of this band.

### **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?:**

No

**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?:**

I think we should align ourselves with those that express reservations regarding use of this band, given the use for RADAR.

**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? :**

Whilst it is likely that providing these bands to provide (channel) capacity increases for 5GHz WiFi, the adoption of bands to improve channel and bandwidth capacity for IMT/mobile broadband use suggests to me that it less of an imperative to agree to this item, especially given the impact on significant capital projects and the infrastructure that support EOS.

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

Yes. The UK has been subject to many changes in this band affecting broadcasters and consumers as the switchover to Digital (and HD) TV services has been executed.

**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?:**

No. UK has experienced too much change already in the Digital Terrestrial TV domain.

**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?:**

Yes.

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

The band should be made available to amateurs who have often collaborated to develop and demonstrate innovative methods of radio communication in (relatively) narrow band allocations.

**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?:**

I would hope that such studies were undertaken, so as to mitigate constraints and effects on existing services BEFORE any such allocations were awarded.

**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?:**

Yes

**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?:**

Yes

**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?:**

Yes

**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?:**

I think this proposition needs careful consideration not just from a regulatory perspective but the very notion that known band(s) will be allocated for such purposes puts this application at risk; there are a number of 'DOS' demonstrations regarding GPS that one would not want to see alongside CnC communications for UAs.

**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?:**

I think it is important to conclude the studies already underway, to be sure about the application of regulations (safe distances, radiated power, co-channel interference limitation etc) to such use. If not already included, the study should look to make its recommendations, taking into account the most recent technologies being trialled or used in this domain.

**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?:**

I support the CEPT position.

**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?:**

Yes - It should be possible to get good communications established in 12.5KHz channel using appropriate (digital) methods.

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

I think the existing AIS use should be protected but only whilst a means to transition to VDES (or similar) is being internationally ratified then executed.

**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?:**

Yes and it would be in UK interests, where we are already strong in this domain, to be a proactive supporter of such developments, ensuring that there is global harmonisation.

**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?:**

No - We should oppose this proposition, given the potential limitations / detriment it would impose on current use.

**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?:**

Yes.

**Question 27: Do you agree that it 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?:**

Yes.

**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?:**

Yes, but we should table the idea that rather than extending the distance, as such, there should be investigation into the use of diversity arrays to more effectively 'paint' the target vehicle(s) and other objects in automated approach/docking/departure and similar maneuvers.

**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?:**

Yes

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

No

**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?:**

Yes

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

I think the Ka band studies need to conclude before a co-ordinated position can be taken.

**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?:**

Yes

**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?:**

The material should be properly curated - History can often inform the future.

**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?:**

No.

**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?:**

Yes.

**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?:**

Yes.

**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?:**

Yes.

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

Yes.

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

No.

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

No.

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

Upgrade of the secondary allocation to the EESS (space to Earth) to primary in the 460 - 470 MHz band needs to be further understood and likely-wise, for propositions to use bands below 690MHz.

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

No.

**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?:**

No.