

Organisation (if applicable):

Tobit Computer Co Ltd

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?:

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?:

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?:

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?:

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?:

No

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?:

Yes, most definitely. At the end of the day, someone has to acknowledge that radio is inherently a broadcast medium and therefore the most efficient use of a chunk of spectrum is to broadcast things. Today those things might include TV and Radio. This may change, but I remain unconvinced that mobile radio usage justifies the bandwidth that the companies say they want.

Freeview not something that should be allowed to wither unless and until there is a demonstrably better (cheaper) method of distribution that can replace it. Radiowave based Television and Radio are not simply going to disappear in a reasonable time frame

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. The lower frequency spectrum should be used for purposes that fit that spectrum's characteristics and not simply provide a cheap method of (temporarily) solving some

perceived "problems" that mobile operators complain about like range and building penetration.

The truth is that mobile operators could do a lot more more with the spectrum they have by improving cellular re-use and turning the "problems" to their own advantage both by more use of femto cells and improving both the quantity and quality of their installed plant generally.

In my opinion, mobile operators are no longer really radio infrastructure providers and operators but, to a larger extent, now "financial engineers". As such, naturally, want to reduce their costs and maximise their revenue. But spectrum, particularly in the volumes that mobile operators say they require, is in short supply. Mobile operators would prefer not to innovate nor to upgrade kit to reduce their cost. They therefore demand spectrum because it is an easy (and these days relatively cheap) "quick win".

OFCOM should be promoting policies that at least encourage users to maximise the overall usage of spectrum assigned. Giving (or selling) it to mobile operators does not fulfil this.

We are seeing the specifications for (even) higher resolution television starting to harden. Where is this television going to go?

It certainly isn't going to please the wired ISPs and their infrastructure suppliers to be asked to quadruple their installed bandwidth when they are struggling to supply reliable IPTV at current resolutions. And even if they do, who is going to pay for it all.

Broadcasting TV and Radio is simple, cheap and very, very efficient. The frequencies it is currently assigned to are more or less made for the job. Why change?

Who is going to pay for the inevitable round of TV conversions?

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?:

The Amateur Service is a useful and socially worthwhile hobby. It has and continues to provide innovation. It also provides technically competent workers for the radio communications industry. It should not be kneecapped just for some short term commercial (or government) profit.

I know it sticks in the craw of the Emergency Services to use radio amateurs during disasters, but they provide a useful backstop of competent communicators WITH equipment, much higher ERP limits and no arbitrary regulatory constraints, for use when all that expensive infrastructure fails because of floods, electrical failure etc etc.

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?:

no

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?:

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?:

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

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.

This is of considerable professional concern to my SME.

I produce message switching (as well as other) software for emergency services. The computers on which the software is based all go to a great deal of trouble to synchronise themselves with UTC. The reason for this is that it is a requirement that there is an accurate audit trail that may be used in the Courts to explain a sequence of events that has happened (or not).

For example: in the Ambulance Service there are a number of incidents per year that require the reconciliation of message logs provided by software systems with clock time and user statements. It would be very difficult to do this for lay people in juries that might have to decide matters of fact if clock time were to be allowed to diverge significantly from UTC. It's bad enough having to explain the hour shift between UTC and BST twice a year as it is without introducing (and tracking) a gradual time shift as well!

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?:

Yes

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?:

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?:

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?:

Don't forget the work of Radio Amateurs in this area.

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?: