

Title:

Surname:

Name:

Representing:

Organisation

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

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?:

i would encourage a cross-cutting IFPG that allows government and industry to develop and discuss cross-cutting strategies/advocacy, and to look for consistency and inconsistencies in positions and associated advocacy. This would overcome the stovepipes addressing respective agenda items.

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

I would raise 1.5 to high -- this agenda item needs to be progressed and completed in order to support the emergence of this new commercial/civil market. There are manufacturing and user industries, and their associated global supply chain, that stand to significantly benefit.

The ITU decision here is a necessary precursor to ICAO standards, and can be made contingent on compliance with those standards.

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

I would like to understand what the overall approach and principles are in terms of ensuring compatibility with incumbent uses. I would also like to see greater coordination on how to

address greyer aspects, such as language proposals urging future agenda items from this one that look at band segmentation.

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 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 urge Ofcom to hold satellite and mobile broadband allocation / IMT identification proposals to the same standards of not constraining existing services, and demonstrate demands.

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?:

Agree with supporting the protection of 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?:

it is critical for the reasons above, in Q2.

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?:

yes

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

the UK approach should focus on ensuring that proposed changes do not have the potential to adversely impact emerging/small operators, whether from developed or developing countries. These new satellite operators increase the satellite and ground station manufacturing opportunities, to the benefit of these industries and their global supply chains.

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

there is no value to satellite operators in changing the Delta T/T + 6% to a C/I criterion, and may have very unintended consequences in terms of adequate protection from satellite and terrestrial services.

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, but see answer to 30.

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?:

we need to avoid this becoming a means by which proposals can seek to rewrite the entire RRs, disrupting a well-developed framework.

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?:

it is important that this issue be addressed in some fashion by the ITU and MS. If not, there is a risk of credibility loss that can impact the future of regulatory solutions for complicated sharing scenarios. This issue is by definition international as more than one country is involved -- therefore, we should not try to be too legalistic in pushing back on offering assistance.

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, there is no value to doing so, and the impact on co-primary allocations that were premised on prior definitions is very complicated, and may have significant unintended and/or unforeseen consequences. It should be a priority to ensure that this is no longer an issue being addressed by WRC.

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, current rules should continue to be applied. experience will determine whether additional unique rules need to be applied, whether due to orbital debris or other concerns.

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

Agenda Item 7 remains a valuable regulatory item, designed to focus on updates due to technology or other operational improvements. No items involving new allocations should be allowed to become "standing".

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

Ofcom should promote specific, narrow agenda items, with a clear work path, and to the extent that there is another agenda item for mobile broadband, it should require not only narrow specificity, but also a JTG to include all relevant stakeholders in the specified bands.

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?:

there should be a national discussion led by the proponents to arrive at the appropriate bands.