

Federation of Communication Services

Additional comments:

The FCS supports the general principle of dividing the bands into coordinated and self-coordinated areas. However, introducing band-internal channelization into the self-coordinated region appears undesirable.

The FCS further notes the intention of reviewing fee structures in the near future. This is a matter of some considerable sensitivity and will be examined at the time, particularly in the self-coordinated areas of the spectrum bands.

Question 1: Do you have any additional information to provide to that presented in this Consultation that you believe Ofcom should consider? If so please provide clearly evidenced views. Are there any other issues that you believe Ofcom should have considered?:

The FCS notes that some equipment types currently in use and on sale have defined bandwidths of 1120MHz in size.

See the response to question 4b.

Question 2: a) Do you agree with our proposals to offer a mixed solution that allows stakeholders to choose between the currently available self coordinated authorisation approach and a new Ofcom coordinated approach for the band? b) Do you agree with the segmented band plan with the split of 2 x 2 GHz and 2 x 2.5 GHz for Ofcom coordinated and self coordinated approaches respectively? c) Is the guard band size of 250 MHz considered appropriate between the two approaches? :

a) The FCS supports this approach.

b) The FCS supports this approach.

c) The FCS makes no comment.

Question 3: a) For the Ofcom coordinated part of the band, do you agree with the proposal to make available channels of 500 MHz and 250 MHz (with smaller channels being made available when the standards are completed) and to make these channels available in up to 1 GHz bandwidth in the first instance? b) Is there a requirement for channel sizes greater than 500 MHz in the coordinated block? Please submit evidence to support your view.:

a) The FCS makes no comment.

b) The FCS makes no comment.

Question 4: a) Are there any aspects of the current self coordinated licensing and link registration process that could benefit from improvements? Please provide specific information and reasons for how your suggestions would improve the process. b) Should Ofcom consider mandating the CEPT channel plan, ECC/REC/(05)07 for the self coordinated block? Explain clearly the reasons to support your view. c) Are the technical parameters shown on the register sufficient to enable self coordination? Should Ofcom consider presenting additional parameters on the register? If so, which parameters and why?:

a) The FCS makes no comment.

b) The FCS notes that the ECC Recommendation proposes internal channelization based on 250MHz channels. This is substantially smaller than some current equipment types and also much smaller than is required for certain applications and content delivery. For technical reasons relating to the delivery of the desired content and the use of a specific modulation system, the bandwidth of some current equipment is 1120MHz. This is obviously incompatible with a band-internal channelization of 250MHz.

The Recommendation foresees this situation in permitting the aggregation of several channels together to form much larger spectrum channels. Thus, for today's standard equipment that has "set" 1120MHz channels, five sub-band channels would be needed (1250MHz assigned) to carry the desired services.

Sub-band channels will involve additional administration overhead. Furthermore, there is a very real possibility of market distortion in both equipment supply and services delivered to the customer and consumers. In any event, sub-band channels of 250MHz will certainly fail to meet the principle of Technology Neutrality.

For example, the possibility exists that a valuable service may not be possible to deploy at a particular location because a competitor has obtained a licence on a single channel at a critical part of the spectrum block. The use of sub-band channelization may make blocking a competitor's service deliver a far easier and cheaper business tactic. Today's management approach does not suffer this problem.

The case for introducing a mandatory channel plan in a self-coordinated band based on the ECC Recommendation seems weak.

c) The FCS notes that the existing arrangements appear to be working. It would therefore appear sufficient to continue with the current parameter list.