

Title:

Mr

Forename:

Howard

Surname:

Del Monte

Representing:

Organisation

Organisation (if applicable):

Weightless Special Interest Group

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:

The Weightless Special Interest Group is developing an international machine-to-machine communications standard that is optimised for very efficient use of the UHF radio spectrum with very low power consumption. The first implementation in silicon, a transceiver chip, was released in February 2013.

Question 1: Do you agree with our proposal not to include Channel 36 in the spectrum to be awarded?:

Yes. The reference to the channel being available for PMSE use, when not required for the propagation study, should also apply for use of the channel by white space devices operating under a geo-location database.

Question 2: Do you agree that the 600 MHz band should be awarded as a single lot?:

Yes. Given the potential time limitations it would be simpler to manage a single source, including its requirement to notify information to the database on unused spectrum.

Question 3: Do you agree that the licence should have an end date of 2026, with a minimum term until 31 December 2018 and a clause enabling it to be revoked after that date, subject to at least 12 months notice having been given?:

No Comment

Question 4: Do you agree with the proposed service obligations for the licence, including roll-out and coverage obligations to ensure 50% UK coverage (and a minimum 25% in each UK Nation)?:

No Comment

Question 5: Do you agree with our proposals to apply a cost-based fee instead of AIP?:

Yes for the short term, however it fails to provide any incentive for notification of unused frequencies as required in the licence - Schedule 1 (5) (2). This could deprive other services of available spectrum.

Question 6: Do you have any other comments on the non-technical licence conditions that are being proposed?:

There should be provision for the monitoring of non-notified unused awarded spectrum. White space device base stations could in principle provide a monitoring service as an alternative to an Ofcom monitoring system. Weightless can discuss such a facility should it be required.

Question 7: Do you agree with the technical licence conditions we propose to include in the licence?:

No Comment

Question 8: Do you agree with our proposal not to restrict any party from participating this award process?:

No Comment

Question 9: Do you have any comments on the proposed award process in the case of a single compliant Notice of Intention to Apply?:

No

Question 10: Do you have any comments on the proposed award process in the case of more than one compliant Notice of Intention to Apply?:

No