

Title:

Mr

Forename:

Nicholas

Surname:

Long

Representing:

Organisation

Organisation (if applicable):

Great Circle Design

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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:

I approve of the policy outlined by Ofcom in this consultation. It is important both to move quickly in releasing this spectrum for SRD use and to keep alignment with CEPT.

I would caution that great care needs to be taken with the intra-SRD or in band sharing arrangements. The SRD types listed all require some form of predictable radio environment in which to operate. The full economic benefit of their use will not be realised unless a suitable intra-SRD sharing scheme is created.

Nick Long 26/3/13

Question 1: What other developments, in addition to the international and public sector developments we have identified, are relevant to our identification and assessment of options for release? :

There is now a greater understanding of sharing arrangements between SRDs, notably reported in ECC Report 181.

Recent work in CEPT is starting to cast doubt on the validity of some results from SEAMCAT simulations, therefore I urge caution when using this tool as a basis for spectrum planning.

Question 2: Do you have any additional information or analyses that could help to inform our assessment of the value that could be created through different uses of the spectrum?:

I am working on a number of analytical tools relating to spectrum sharing that I have been making available to CEPT SE24 and these are also available to OFCOM.

Question 3: Do you agree with our proposal to release 870-876 MHz / 915 -921 MHz for licence exempt SRD and RFID applications if Government releases 870-872 MHz / 915-917 MHz? :

Yes

Question 4: Do you agree with our proposal to release 872-876 MHz / 917-921 MHz for licence exempt SRD and RFID applications if Government does not release 870-872 MHz / 915-917 MHz? :

Yes

Question 5: Do you have a view on the sequencing and timing of Ofcom's next steps if the spectrum is released for licence exempt SRD and RFID applications?:

I think this is a good approach.