

Title:

X

Forename:

X

Surname:

X

Representing:

Organisation

Organisation (if applicable):

X

Email:

What additional details do you want to keep confidential?:

Keep organisation 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: 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? :

Our production alarm systems operate in the 868MHz SRD band. Testing has shown they are under some threat from imminent band 20 LTE deployment. In response to this, we would like to develop systems using multiple distinct bands in the UHF space. It is cost effective if these bands have some spectral spacing but are all adjacent to the existing 868MHz SRD segment.

Also, there is a well known Region 2 ISM allocation that is used in the USA and Australia. We would like to develop common equipment exploiting this potential EU / region 2 spectrum commonality.

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?:

We manufacture and export equipment around the world. Some of our products sell at half a million per year. Access to additional bands will allow us to offer even more reliable and robust communication systems that will directly benefit consumers, many of whom are aged. The demands placed on our service will increase with the ageing population.

Additional spectrum will also provoke innovation, with new product concepts being enabled, which ultimately support new services. Release of new spectrum allows new standards to be adopted, without being shackled to old, legacy technology interworking requirements

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?:

We would like access to some portion of the 915-921MHz band as soon as possible, for international product development.

The 870-876MHz segment is also attractive and if it was available over the same time frame, we would include it in this new development work.

Ofcom's proposed timetable (table 1.1 in the Consultation document) is acceptable to us.