Question 1: Do you agree with Ofcom?s proposal to give an 18-month notice period for the closure of the 10.68 to 10.7 GHz band to new SRD deployments?:

BEAMA agrees with OFCOM's proposal if there is an acceptable response to our answer to Question 2.

Question 2: Do you agree with Ofcom?s proposal to licence exempt MSS user terminals operating in the 1518 to 1525 MHz and 1670 to 1675 MHz bands?:

A number of BEAMA Members design and manufacture presence-detecting lighting controls, using a microwave sensor to detect occupancy. There is a need to eliminate unwanted interaction between adjacent units when their operating frequencies are very close, otherwise there would be an unacceptable risk of lights switching on at random times in vacant areas. The affected products are operated in CW (Continuous Wave). The possibility of interaction between adjacent units is eliminated by dividing the allocated band into sub-bands and tuning each product to one of four different centre frequencies. Installers are instructed to arrange that products with the same centre frequency are not installed within range of each other. In order to cope with frequency drift with time, temperature, voltage etc, as much space as possible between our sub-bands is required. The band currently allocated is 25MHz wide and the only viable alternative, centred on 10.587GHz, is just 20MHz wide which is insufficient.

In seeking resolution to this issue, we would also request that consideration be given to allocating a band of at least 30MHz that is harmonized with other major European economies to enable us to maximise our cost effectiveness in export markets by minimizing the number of different frequency bands we need to use (the current UK allocation is unique).

Withdrawal of the product range would be commercially unacceptable. Some members estimate that a redesign of their entire product range would cost possibly as much as a year's revenue, without factoring in the lost opportunity of what other new developments that could have been worked on.