

Licence Exemption of Wireless Telegraphy Devices

Proposed changes

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?

The LPRA has consulted its members who have an interest in the 10.68 to 10.7 GHz band and based on those consultations wish to make the following response to OFCOM.

- 1) The LPRA acknowledges the reasons cited by OFCOM for closing this band and support the decision provided that the following concerns of our members are resolved.
- 2) The current UK allocation of 10.675 to 10.699 GHz is unique in the EU and as such our members are obliged to design, manufacture and supply specific products for the UK market.
- 3) The UK is a large user of microwave Doppler radar transceivers, primarily for intrusion alarm detection and energy management applications. Documented evidence supports the supply of several million products operating within this UK only allocation by our members.
- 4) Other EU countries that are large users of microwave Doppler radar receivers generally provide allocations designated in ERC recommendation 70-03 within Annex 6(d) the 10.5 to 10.6 GHz band or Annex 6(c) the 9500 to 9975 MHz band. In all cases these individual allocations provide for a minimum of 40 MHz contiguous bandwidth.
- 5) The current UK bandwidth of 25 MHz is barely sufficient to support the technical requirements of the major applications listed above, where products that are fitted in close physical proximity are required to operate with a minimum frequency separation to avoid mutual interference. Alternative interference mitigation techniques are available, but would require the development of new, more complex products once again unique to the UK market at an increased cost to UK consumers and reducing the competitiveness of UK suppliers in the EU.
- 6) The currently available alternative UK allocation of 10.577 to 10.597 GHz **DOES NOT** provide sufficient bandwidth for these applications without either employing the mitigation techniques referred to above, or reducing the integrity of these safety related systems.
- 7) The LPRA therefore requests that, before the 10.675 to 10.699 GHz band is closed, an alternative allocation be opened with a minimum contiguous bandwidth of 40MHz, ideally within the ERC 70-03 recommendation Annex 6(d), 10.5 to 10.6 GHz band, either by extending the 10.577 to 10.597 GHz band, or preferably by allocating 10.50 to 10.55 GHz to bring the UK into line with other major EU users of such products including Italy, Holland, Belgium and Spain.

- 8) This change would improve the competitiveness of UK suppliers into the EU (by enabling them to supply common products) and reduce costs to UK consumers by allowing them to benefit from the resulting economies of scale.