Additional comments:

Here are a few thoughts from someone who
uses radio communications for 30 years in many guises and licence types, and just wants to see the spectrum develop in a democratic but meaninfull way.

Question 1:What future uses might this spectrum support:

Automotive key fobs.

Other low power devices.

A licence exempt two way radio service
similar to PMR446.

Question 2:What implications might these possible future uses have for the way in which this spectrum is configured in terms of transmit powers, bandwidth and geographic coverage? For example:

- **Could these possible future uses be accommodated under the existing Business Radio licence products? If so, would they need the channel widths of the existing Business Radio licence products to be increased above 25 kHz ?**
- **Alternatively, would they require an entirely new licence product to be developed?**
- **Do you think that we should allocate (at least) some of this spectrum for licence exempt use?**
- **If (at least a part of) this spectrum is made available for use under the existing Business Radio licence products, do you think that more spectrum should be allocated for light licence products as against technically assigned or area defined products?**

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Licence free/exempt use would have little
impact upon existing spectrum users or
the current licencing regimes anywhere
within the UK. This assumes that all devices
are low power,or a a maximum of 5 watts ERP.

Question 3:What factors should Ofcom take into account in deciding how to make this spectrum available (both in terms of the choice of release mechanism and in terms of the timing and speed of release)?:

I do not think that there are really any factors
to take into account. Simply releasing some spectrum that amounts to a handful of
12.5 khz channels, for uses that have limited

range or scope of interference to other users
is hardly going to need a lot of effort to either
release them or regulate them.

The speed of release could therefore be very fast.

Question 4:What total bandwidth in megahertz (MHz) would you require to operate the prospective service (whether the authorisation is provided under licence or is licence exempt)? (eg. if answering 25KHz, please make clear if this is 1 x 25 kHz or 2 x 12.5 kHz):

100 - 200 Khz for each service depending
upon whether 12.5Khz or 25Khz channels.

**Question 5:Would this bandwidth need to be contiguous?
If so, please explain why your service requires contiguous blocks only.
If not, what would be the size of individual channels within the overall bandwidth?:**

No need to be contiguous, but as always
in some case contiguity does assist in band
planning alongside other services in the future.

Question 6:If you think the prospective use would be suitable for licence exemption, please indicate the transmit power levels you are likely to require:

LPD's could be limited to milliwatts.

A licence free two way communication
system should be limited to 5 watts ERP.

Question 7:In which geographic area are you likely to use the spectrum (eg. UK Wide, Regional, Conurbations, Rural):

UK wide.

Question 8:Please give a brief description of the technology (ies) that you will be using with the spectrum that you license:

Analogue or digital. Allocations should be
technology neutral.

Question 9:Would you require a minimum licence tenure for you to consider operating your service? If so, how long (in years) would you want this minimum licence tenure to period to be (noting that you might need to pay for the full minimum tenure period on licence issuance)?:

The ideas proposed shouldn't need to be
time limited because of their nature.

Question 10:As explained in section 2, the existing Business Radio licence products are currently made available in bandwidths of 6.25, 12.5 or 25kHz, although it would be possible to make them available in larger bandwidths where there is enough spectrum to enable this (as is the case with this newly available Mid Band VHF spectrum). In light of this, would your prospective use of this newly available Mid Band VHF spectrum:

Be possible using one of the existing Business Radio licence products in the currently available bandwidths (of 6.25, 12.5 or 25kHz)? Be possible using one of the existing Business Radio licence products, but in a bandwidth greater than 25 kHz (but with other licence conditions remaining as now)?

Require a new type of licence

Require licence exemption

Don?t know:

Require licence exemption.

Question 11:If your prospective use of this newly available Mid Band VHF spectrum would be possible using one of the existing Business Radio licence products, which existing licence product would it require?

Simple Site
Simple UK
Suppliers Light
Technically Assigned
Area Defined

If your proposed use is Technically Assigned please indicate if the use will be shared or exclusive:

N/A

Question 12:Which existing Business Radio licence type do you currently hold? (Please type in product name) Simple Site, Simple UK, Suppliers Light, Technically Assigned, Area Defined, Combination of the above, None, Don?t know :

None.

However I am covered by other users Simple UK licences for other organisations.

Question 13:Would additional spectrum allow you to consolidate existing assignments? (If so, please provide information on the assignments that you may hand back to Ofcom as a result of consolidation):

N/A

Question 14:Do you have any further comments:

I would like to see an effective licence free
service similar to the PMR446. Currently
PMR446 has a problem with either the
lack of decent equipment made available for a reasonable cost, and yet at the same time suffers a proliferation of cheap devices readily available that often makes more serious use problematical (e.g. - full of children pressing roger bleep buttons all day long and frustration for more serious
users).

Let's have a 3 - 8 channel licence exempt service that allows sensibke users with sensible equipment easy access to radio
communications that inherently discourages low quality operators and equipment. It doesn't take much effort to
implement it or cause problems for any other spectrum users.

The USA have a similar service called the FRS/GMRS/MURS and that works perfectly well.