

Additional comments:

Question 1:What future uses might this spectrum support:

The spectrum would best be used for the land mobile radio service.

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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Future uses could be (should be) under existing business radio license products since the newly available spectrum is close to and technical similar to existing spectrum.

All existing business "licences should be considered including "light" and "technical assigned" and "geographically assigned".

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)?:

With respect to the frequency band at 146-148MHz Ofcom should consider allocation of this to the Amateur Radio Service.

This would meet one of Ofcom's previously stated objectives of bringing amateur radio assignments in IARU Region 1 and IARU Region 2 in to line.

Specific spot frequencies in 146-148MHz, for example Fire Alerting (pagers) at 147.800MHz could be retained by exclusion of use by amateurs.

If appropriate (if necessary) some of the 146-148MHz band could be assigned to amateurs on a primary user basis and some on a secondary user basis.

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):

Individual channels could be assigned for simplex (single frequency) working on a 6.25KHz or 12.5KHz channel spacing.

Duplex channels (split frequency) could be assigned on a 2 x 6.25 or 2 x 12.5KHz basis.

Assignments should be technology neutral but have a preference for digital systems that are more spectrum efficient.

**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?:**

See Q4

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:

Some spot frequencies might be given to PMR General or Business Light use at 5W.

License exempt services should probably use 0.5W power like at UHF if a high density of users is desired.

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

UK

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

Digital PMR (DMR) and dPMR.

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)?:

5 years

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:

Don't know

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:

Any of the following:

Simple UK

Suppliers Light

Technically Assigned

Area Defined

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 :

Combination: Simple UK and Suppliers Light

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):

Possibly but depends on what Ofcom do.

Question 14: Do you have any further comments:

No thank you.