

***everything everywhere™***

*Everything Everywhere Limited  
Response to the Ofcom consultation on  
Crown Recognised Spectrum Access in  
3400MHz to 3600MHz*

**January 28th 2011**

## Summary

Everything Everywhere welcomes the opportunity to respond to the Ofcom consultation on Crown Recognized Spectrum Access in 3400 to 3600MHz.

We support the Ofcom positions in the consultation with respect to:

- Re-locating Emergency and Public Safety Services (EPSS) from 3442-3475MHz to 3410-3443MHz.
- That there is no intention to allow satellite use in the band in the future.
- The use of the base station in block power limit of 53dBm/MHz.
- That mobile terminals should comply with EN 302 623.

We believe that Ofcom should:

- Clarify the long term future of the band within the context of EC Decision 2008/411/EC
- Reconsider its position with respect to minimum spectrum trading units and that a minimum trading unit size of 5MHz should be applied.
- Reconsider the use of the base station out of block Commission Decision block edge mask up to UK Broadband boundaries at 3480MHz, 3500MHz And 3580MHz.

## General

This consultation involves the 3400MHz – 3600MHz band which is part of the region identified for mobile use (referred to as terrestrial electronic communications networks) within Europe in accordance with the ECC Decision of 30 March 2007 (ECC/DEC/(07)02) and EC Decision of 21 May 2008 (2008/411/EC). Both Decisions allow the possibility to use this band for IMT type technologies such as LTE and WiMAX. In addition the ECC is developing a harmonised frequency arrangement for IMT systems for this band and therefore this spectrum has the potential to have high value.

This is the second consultation<sup>1</sup> affecting specifically the 3400 – 3600MHz band and in view of its strategic importance to the UK requires a harmonised band plan to take advantage of economies of scale by aligning to developments by the ECC and 3GPP to provide technical performance characteristics and band plans.

Everything Everywhere welcomes the proposal to enable Recognized Spectrum Access as a step to the development of Electronic Communications Services in the 3400-3600MHz band.

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<sup>1</sup> Crown Recognised Spectrum Access in 3400 to 3600 MHz Consultation on spectrum policy and on terms of new grants and licences, 25 September 2009

## **Emergency and Public Safety Services**

Everything Everywhere supports the re-location of Emergency and Public Safety Services to the frequency range 3410-3443MHz from 3442-3475MHz. We also support the proposal that funding be made available to EPSS operators to facilitate the move. We believe that costs could be minimised if early notice was given to EPSS users with a 5 year or greater notice period. A positive re-location decision would act as a significant step in making the band available for broadband electronic communications services within the context of 2008/411/EC and inform stakeholders in relation to the development of proposed band plans at ECC PT1.

## **In block & out of block limits for base stations & terminals**

Everything Everywhere supports the proposed BS in band power limit of 53dBm/MHz. We do however have reservations about the use of the out of block 2008/411/EC BEM up to the 3480MHz, 3500MHz and 3580MHz boundaries as we believe that this would in some scenarios insufficiently protect UK Broadband services.

Everything Everywhere supports the use of a BEM based on EN 302 623 for terminals.

## **The long term future of the band**

We believe that Ofcom should clarify its view of the future of the band within the context of EC Decision 2008/411/EC and developments within Europe to define a harmonised channelling arrangement for this band. 2008/411/EC provides for protection of existing use whilst reserving new use for electronic communications services and thus provides little clarity beyond stasis within the band. Stakeholders need to understand more fully Ofcom policy towards the band over a 5 to 10 year timeframe to allow them to make efficient decisions with respect to the enabling of Recognized Spectrum Access. EE is aware of developments within the ECC to develop a harmonised frequency arrangement for IMT systems for this band. An ECC Decision is currently being developed and it is intended to be finalised by December 2011.

## **Minimum Spectrum Trading Units**

Everything Everywhere believes Ofcom should reconsider the issue of Minimum Spectrum Trading Units. We have concerns that without a defined minimum trading unit or greater clarity from Ofcom in relation to medium/long term designation of the band an inefficient market may develop with respect to any long term consolidation. EC Decision 2008/411/EC provides for protection of existing use whilst reserving new use for electronic communications services. This provides insufficient clarity to the market with respect to trading of units, their optimum size and their possible value. A minimum 5MHz trading unit would provide a clear signal to the market regarding prevention of fragmentation.

## Contact

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