#### Title:

Mr

#### Forename:

David

#### Surname:

Hall

## **Representing:**

Organisation

## **Organisation (if applicable):**

David Hall Systems Ltd

#### Email:

davejhall@aol.com

#### What do you want Ofcom to keep confidential?:

Keep nothing confidential

#### If you want part of your response kept confidential, which parts?:

#### Ofcom may publish a response summary:

Yes

#### I confirm that I have read the declaration:

Yes

#### Of com should only publish this response after the consultation has ended:

You may publish my response on receipt

#### **Additional comments:**

Question 1: Do you agree with the list of proposed RSA parameters for assessing interference and for setting fees for receive-only earth stations? Are sufficient parameters defined for a grant of RSA? If you disagree, please give your reasons and suggest alternatives.: Generally we are in agreement with the parameters. Our only concern relates to paragraph 4.9 where it states that other users are not subject to excessive constraints but no further details are given. We consider that in view of the investment in the satellite system this usage should be given greater protection than other users of the band.

# Question 2: Do you agree with the proposals for introducing fees for RSA for receive-only earth stations in the bands concerned on the basis of parity with existing PES fees (with a minimum fee of £500) and that the full fees be implemented from the date of grant of RSA? If you disagree, please give your reasons and suggest alternatives:

We are not convinced that the calculations produce the correct values when considered on the basis of the different uses of the bands. However the values quoted do reflect the sharing difficulties and the factors used in the calculation. Thus we consider that more research is required on the means of calculating the value so that it is more reflective of the spectrum usage value rather than other factors.

#### Question 3: Do you agree that grants of RSA in the bands should normally be on a rolling annual basis, with a 5-year revocation period?:

Generally we agree with these proposals though we consider that in certain circumstances a longer revocation period may be appropriate. This is based on the view that the period covered by the rolling annual basis and the 5 year revocation period should approximately equal at least the expected investment lifetime. We recognize that there may be difficulties in determining the expected investment lifetime and the date of entry into service for the receive only earth station but we consider that these difficulties could be overcome and our proposal is feasible.

#### Question 4: Do you agree that grants of RSA in the bands should be tradable and that grants of RSA and WT licences should be inter-convertible? If so, do you agree with our proposal to model the process for trading and conversion on that for RSA for radio astronomy? :

Generally we are in agreement with the proposals though we are not convinced that this will result in more efficient use of spectrum or the usage migrating to higher value purposes.

# Question 5: Do you agree with our proposed procedure for considering applications for the grant of RSA to receive-only earth stations. If you disagree, please give your reasons and suggest alternatives? :

We are concerned that where the predicted interference is above the acceptable level the satellite operator may not make a request for RSA as the request could be unsuccessful and the process of obtaining RSA is unlikely to change the level of existing interference. We consider that there should be more certainty that RSA will be granted and the process should give greater protection to the satellite operator. We consider that it might be appropriate to do this by taking the operational dates of the earth station and other links into account as a basis for providing greater protection to the satellite system though we recognize that this may not be a fully satisfactory approach.

We consider that it may be difficult to use commercial agreements as a means of reducing interference between different operators. However we consider that this idea should be developed further as it may result in the development of a workable solution.

Question 6: Do you agree that RSA for receive-only earth stations could provide greater security against interference and help promote optimal use of the 1690 - 1710, 3600 - 4200 and 7750 - 7850 MHz bands? If not, please explain why and describe any alternative mechanism that you consider to be necessary.:

RSA will provide greater security against future possible interference but appears to have little impact on existing possible interference. This may have implications for the take-up of RSA. We also have doubts that RSA will result in the optimal use of spectrum, particularly for the band 1690 - 1710 MHz. We have stated in our response to question 2 that a different means of valuing the spectrum is required and this is considered necessary to make RSA more effective and assist in achieving its objective of better spectrum usage.