

Question 1: Is there demand to use the band for wireless cameras?..

IPWireless has no visibility of interest in wireless cameras in this particular band. Whilst, the provision of spectrum for wireless cameras for the Olympics in 2012 is a very worthy cause, there are other more appropriate bands. In any case this band would only add a very small number of channels to the pool.

Question 2: Is there demand for other uses of the band?:

Yes. This is prime IMT2000 unpaired spectrum in that it is a significant quantity of spectrum that is relatively unaffected by co-existence issues with neighbouring bands. Whilst the unpaired part of the IMT2000 spectrum has been only very lightly used until now, there have been some recent developments in technology that will change this.

The most important of these developments is the in the area of mobile broadcast technologies such as IMB (3GPP) and eMBMS (LTE). These technologies, which are in the first instance targeted at linear real time TV, have a multitude of other broadcast applications such as background download of popular audio (iTunes, Spotify), video (iPlayer, YouTube), written material such as newspapers and general applications such as games. The broadcast of such content will go a long way to alleviating the capacity crunch that is looming with the rapidly growing data demand on the mobile networks that cannot easily be satisfied even with additional spectrum for 3G and 4G bi-directional technologies. IMB is endorsed by the GSMA. Multi-operator pilots of this technology are starting now in European countries.

TD-LTE could also be used in the spectrum. TD-LTE is emerging as an integral part of the overall LTE offering. Such a technology could be used either for standard macro-cellular service or as a femto-layer for capacity relief on standard cellular but also for government/public safety applications. The latter use is of growing interest in the UK and other countries and may be important for use in the Olympics itself.

Question 3: How might demand for the band change in the foreseeable future?..

It can be seen from the escalating value of this 2010MHz spectrum in the auctions that are happening around Europe and the specific attention it has received from the big MNOs that the interest in this particular band for the uses referred to above (in our response to Question 2) is growing. Therefore it is important for Ofcom to carefully consider allocating the spectrum temporarily or permanently to wireless cameras as this may not be the best use of the spectrum and will put the UK out of alignment with the rest of Europe.

Question 4: Should any wireless-camera use of the band be licence-exempt?..

No strong opinion either way.

Question 5: Should any other use of the band be licence-exempt?..

No, if the spectrum is not used for wireless cameras it should be licensed in the normal way as per the 2.6GHz band.

Question 6a: If we allocate the band to PMSE, is there good reason not to set TLCs to allow all of 2010-2110 MHz to be treated as a single band?..

No strong opinion either way.

Question 6b: If so, what TLCs should we set?..

Question 7a: If we allocate the band to PMSE, is there good reason not to provide the same security of tenure as for other PMSE-allocated bands?..

Yes. Any security of tenure for PMSE could impact the ultimate value generated from the spectrum for other mass market uses and affect the UKs alignment with the rest of Europe.

Question 7b: f so, what security of tenure should we provide?..

Question 8a: If we allocate the band to PMSE, is there good reason not to set fees for access on the same basis as most of the spectrum at 2-3 GHz used for wireless cameras?..

No strong opinion either way.

Question 8b: If so, how should we set fees for access?..

Question 9a: If we do not immediately decide to allocate the band to PMSE, is there good reason not to allow temporary use for wireless cameras in line with our approach to the 2290 MHz band?:

Yes. The provision of spectrum for wireless cameras for the Olympics in 2012 is a very worthy cause but the use of this spectrum temporarily for this purpose might do damage to its long term value. Some of the services delivered by the new technologies targeted at the band might be best launched during the Olympics using this event as a springboard for the service launch. This would apply to any mobile broadcast technology where there will be a massive demand for mobile TV services and general news information during the Olympics itself. The same dynamic would also apply but to a lesser extent for any public safety broadband application of the spectrum, where the greatest near term need might be during the Olympics itself for security and other purposes.

Question 9b: If so, what should we do until we make and implement our decision on the best way to release it?:

The spectrum should be auctioned or issued on a competitive basis ASAP or with the 2.6GHz spectrum.

Question 10: Do you agree we should make the 2010 MHz band available for the Olympics?..

We have described in answers to the other questions our concerns around allocating this spectrum to the Olympics for wireless cameras. However, if this is the chosen policy it

should be done in a way that places minimal restrictions on subsequent mass market use of the spectrum beyond the Olympics. Otherwise the ultimate value of the spectrum will be affected.