

**Title:**

Mr

**Forename:**

Kenny

**Surname:**

Kamal

**Name and title under which you would like this response to appear:**

Chief Technology Officer

**Representing:**

Organisation

**Organisation (if applicable):**

MLL Telecom Ltd

**Email:**

k.kamal@mlltelecom.com

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

Keep nothing confidential

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

Nothings is required to be kept confidential

**Ofcom may publish a response summary:**

Yes

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

Yes

**Ofcom should only publish this response after the consultation has ended:**

You may publish my response on receipt

**Question 1: Do you agree that the spectrum commons model should be the preferred approach for licence-exempt use of spectrum, and that application-specific allocations should only be considered where technical constraints or safety issues require this?:**

MLL agreed with this approach, as long as any constraints are clear. We strongly request these constraints are enforced.

**Question 2: Do you agree with the proposal for multiple classes of spectrum commons?:**

Limited work has been done on politeness rules and we are concerned that this may introduce delay into any the way the changes are implemented.

**Question 3: Do you agree with the distinction made between the licence-exemption and light-licensing regimes?:**

Agreed

**Question 4: Do you agree with the view that the licence-exemption and light-licensing regimes will converge in the future?:**

We do not agree with this approach. The disadvantages of convergence out weigh any advantages that may be gained. The Light licensing regime has been a successfull one.

**Question 5: Do you agree with the proposed mixture of licence-exempt and light-licensed use of the 105-275 GHz spectrum? Do you agree with the bands that have been identified for such use?:**

In this frequency band we agree with approach.

**Question 6: Do you agree with the view that the use of the 275-1000 GHz spectrum should be licence-exempt?:**

yes

**Question 7: Do you agree with the view on the levels of future demand for licence-exempt usage in the 40-105 GHz spectrum? Do you agree that the Group-A bands identified above should be considered for licence-exempt use? Do you agree that licence-exempt and light-licensed use of the Group-C bands identified above should only be considered when there is evidence of demand for such use?:**

yes we agree

**Question 8: Do you think it could be desirable for transmissions at levels below certain power spectral density limits to be exempt from licensing?:**

yes

**Question 9: Do you agree with the transmission limits proposed in this document?:**

yes

**Question 10: Do you agree with the harmonisation strategy discussed above in the context of licence-exempt device?:**

MLL agrees with the harmonisation strategy that has been presented

**Question 11: Do you agree with the view that no additional regulatory instruments, beyond those available today, are required for the protection of licence-exempt equipment:**

Yes

**Comments:**