

**Question 1: Do you agree with Ofcom's proposal to exempt users of Citizen's Band (CB) radio (and other related applications such as Community Audio Distribution) from the need to possess a Wireless Telegraphy Licence.: yes**

**Question 2: Do you agree with Ofcom's proposals to permit the use of 'Micro' FM transmitters in the UK, and to authorise that use by licence exemption.: yes**

**Question 3: Do you agree with Ofcom's proposals to exempt users of High Density Fixed Satellite Services (HDFSS) terminals from the need to possess a Wireless Telegraphy Licence.: yes**

**Question 4: Do you agree with Ofcom's proposals to exempt users of Inmarsat GAN terminals from the need to possess a Wireless telegraphy Licence.: yes**

**Question 5: Do you agree with Ofcom's proposals to make available the frequency 24.05-24.25 GHz for use by short range radar (including automotive applications) devices on a licence-exempt basis.: Siemens VDO Automotive fully agrees to make available the frequency 24.05 - 24.25 GHz for use by vehicular short range radar (SRR) devices on a license-exempt basis.**

According to Table 2.9 we understand that Category viii from 24.150 - 24.250 GHz is the already existing band without any interference mitigation requirements (i.e. a pure Movement Detection System (MDS) with Doppler operation mode is possible.

For Category vii from 24.050 - 24.150 GHz we propose to change the other interference mitigation requirement from "Minimum sweep rate 2 MHz/ms" to "Minimum carrier frequency change rate 2MHz/ms" to include any kind of SRR device that meets the frequency change requirement of 2 MHz/ms like e.g. a frequency hopping SRR.

Rationale:

The requirement "Minimum sweep rate 2 MHz/ms" may create the impression that only frequency modulated, continuous wave (FMCW) SRR are allowed to operate in this frequency range.

There are, however, other technologies like pulsed FMCW, frequency hopping (FH) or pulsed FH systems available with no explicit sweep rate but an identical carrier frequency change over time with often much lower risk of interference probability due to the additional duty cycle average power reduction effect. Based on technical neutrality aspects such devices may not be excluded from operation within the frequency range 24.05 - 24.15 GHz.

Furthermore we propose that these changes should be also incorporated in the CEPT Recommendation REC 70-03 under the UK national restriction list.

**Question 6: Do you with Ofcom's proposals to make available the band 2.4 GHz-2.4385 GHz for movement detection systems.: yes**

**Question 7: Do you with Ofcom's proposals to remove the need for users of most radar level gauge equipment to possess a Wireless Telegraphy Licence.: yes**

**Question 8: Do you agree with Ofcom's proposals to exempt users Digital PMR 446 from the need to possess a Wireless telegraphy Licence.: yes**

**Question 9: Ofcom would welcome comments on it proposals to implements these changes concerning short range devices.: see Question 5**

**Question 10: Ofcom would welcome comments on its proposals to implement EC Decision 2005/928/.** no comment

**Question 11: Ofcom would welcome comments on its proposals to implement EC Decision 2005/513/.** no comment

**Question 12: Ofcom would welcome comments on any of the minor changes set out in this chapter and any other broader issues in relation to its approach to licence-exemption.** no comment

**Additional comments:** no comment