

Additional comments:

NATS welcomes the opportunity to comment on the proposal to make the Wireless Telegraphy (Ultra-Wideband Equipment) (Exemption) Regulations 2015. NATS understands the implementation of the EC UWB Amending Decision is a mandatory requirement for all Member States.

We have not responded to all questions and the absence of a comment on any given question should not be interpreted as either agreement or disagreement.

Question 1: Do you have any comments on the drafting of the Proposed Regulations?:

NATS has identified a number of apparent transposition errors throughout the Proposed Regulations. Corrective suggestions are laid out below:

- Replace text "[x]dBm" with "[x]dBm/MHz" in:

- 6 (d) (i) (aa)
- 6 (e) (i) (bb)
- 14 (d) (i) (aa)
- 14 (e) (i) (aa)
- 14 (e) (i) (cc)
- 14 (f) (i) (bb)
- 14 (f) (i) (cc)
- 14 (h) (i) (bb)
- 14 (h) (i) (cc)
- 18 (d) (i)

- Replace text "MHZ" with "MHz" in:

- 10 (f) (i)

- Replace text "exterior limit of -53.3 MHz" with "exterior limit of -53.3 dBm/MHz" in:

- 14 (d) (i) (bb)
- 14 (d) (i) (cc)
- 14 (d) (ii) (bb)
- 14 (d) (ii) (cc)
- 14 (e) (i) (bb)
- 14 (e) (i) (cc)
- 14 (e) (ii) (bb)
- 14 (e) (ii) (cc)
- 14 (f) (i) (bb)
- 14 (f) (i) (cc)
- 14 (f) (ii) (bb)
- 14 (f) (ii) (cc)
- 14 (h) (i) (bb)
- 14 (h) (i) (cc)
- 14 (h) (ii) (bb)
- 14 (h) (ii) (cc)
- 14 (i) (i) (bb)
- 14 (i) (ii) (bb)

- Replace text "maximum peak power density no greater than [x] dBm" with "maximum peak power no greater than [x] dBm" in:

- 18 (a) (ii)

- o 18 (c) (ii)
- o 18 (d) (ii)
- Replace text "maximum peak e.i.r.p. density no greater than -45.0 dBm" with "maximum peak power no greater than -45.0 dBm" in:
 - o 18 (b) (ii)
 - Replace text "[x] dB/MHz" with "[x] dBm/MHz":
 - o throughout Regulations 23 and 24
 - Replace text "power spectral density no greater than -50dB/MHz" with "power spectral density no greater than -60dBm/MHz" in:
 - o 24 (l) (i)
 - Replace text "peak power no greater than -25.0 dBm" with "peak power no greater than -35.0 dBm" in:
 - o 24 (l) (ii)

NATS believes there is a possible error in the presentation of the Table in 2014/702/EU Decision, ANNEX, Section 4 (Row - 6,6752 < f < 8,5 GHz). It would appear that footnotes 9 and 10, as referred to in the 'mitigation techniques' column of the aforementioned section, stipulate more stringent maximum power spectral density levels within this band than stated in the main table row.

NATS believes this possible error has been reflected in Proposed Regulation 18 therefore suggests a review of Proposed Regulation 18 is considered and amended as necessary.

NATS also believes Proposed Regulation 17 (4) does not reflect the intention of the Proposed Regulation and may be a consequence of the possible issues within Proposed Regulation 18, as described above. As written, NATS believes "17. - (4) The ultra-wideband equipment must - (a) ...; OR (b)" could be interpreted as permitting equipment transmissions levels without restriction below 6.0 GHz and above 7.9 GHz. With reference to the potential issues within Proposed Regulation 18, NATS suggests a review of Proposed Regulation 17(4) is considered and amended as necessary.

Question 2: Do you have any comments on the technical aspects of the Proposed Regulations:

Question 3: Do you have any comments on the defined terms in Regulation 3 of the Proposed Regulations?:

Question 4: Do you have any comments on the Regulatory Impact Assessment?: