

Title:

Mr

Forename:

J. P.

Surname:

Gilliver

Representing:

Self

Additional comments:

Like many recent "consultations" from OfCom, this one definitely gives an impression that most of the decisions have been made, with the consultation only being undergone because of legal necessity.

\\

Also, the "detriment of innovation" and similar phrases/arguments do seem to appear rather too often where OfCom are trying to achieve a decision that minimises effort on OfCom's behalf.

Question 1: Do you have any evidence to inform Ofcom's view on the density of higher duty cycle (up to 10%) NRPs deployments, whether this is likely to exceed 10 NRPs/ km² and the total number of higher duty cycle NRPs that might be deployed?:

No.

Question 2: Do you have a view on how intra-network interference caused by NRPs deployed in large numbers within a network will be managed?:

The interference consideration appears only to consider interference between NRPs (either within a network or between networks); interference to other band users, if any, and certainly to nearby spectrum users, does not seem to be under consideration.

Question 3: Do you have any evidence that networks may fail if the aggregate density of higher duty cycle NRPs reaches or exceeds 10 NRPs/ km²?:

Given that the system only exists in the future, no.

Question 4: Do you have any views on whether exchanging NRP deployment information between licensees and developing and using an industry-managed

code of practice would be practical and sufficient to manage the risk of some networks failing?:

No.

Question 5: Do you think CCA as defined by ETSI will be an effective protocol for (a) managing interference between networks? (b) managing interference to short range devices using the 870-876 MHz band?:

(a) maybe. There might be scope for a requirement that the receiver (or, more precisely, receiver/aerial combination) used for CCA be more sensitive than that used for actual communication, or if the same receiver/aerial combination, be obliged to have a lower threshold.

\\

(b) I am less certain. Especially if there is to be any difference in the signalling/protocol/whatever used by the proposed nodes and by the SRDs.

Question 6: Do you have a view on the costs and benefits of adding effective mitigation protocols such as Clear Channel Assessment to higher duty cycle NRPs?:

The costs are presumably those of developing and incorporating the mitigation protocols; given the numbers of nodes OfCom seem to be anticipating, such costs should work out at quite a low incremental cost per node. The benefits of any such arrangement - if effective, as stated in the question - are surely self-evident.

Question 8: Do you agree with our proposals to authorise spectrum for NRPs using non-exclusive network licences available on demand?:

(This is actually Q7!)

\

I feel the rush to permit something, rather than waiting for a European standard, may be unwise.

Question 9: Do you agree with the proposed licence conditions for higher duty cycle NRPs?:

The decision (?) to offer unlimited licensing, mitigated by the requirement to keep good records, seems to me a good compromise between administrative effort (particularly on the part of OfCom) and control. I would suggest the addition of (a) a requirement that operators provide the details of frequencies, locations, and maximum (effective, i. e. including aerial gains) powers, for free on a publically-accessible website whose URL they provide to OfCom (and Ofcom provide and maintain a list page of these supplied URLs - and maybe specify a common format for the information), and (b) that OfCom require the ability to demand - without justification - the shutdown of any given node within 24-36 hours (obviously this would be separate from the licence duration, which at 2 years seems reasonable).