

Your response

Question	Your response
<p>Question 1: Do you agree with the prioritisation of the agenda items, as shown in Annex 5, and if not why?</p>	<p>Confidential? – Y / N</p>
<p>Question 2: Ofcom is supporting the following three priority bands for IMT identification in the RRs:</p> <ul style="list-style-type: none"> 24.25 – 27.5 GHz 40.5-43.5 GHz (as part of a wider global 37-43.5 GHz tuning range) 66 – 71 GHz <p>If you don't agree with any of these bands, or think we should be promoting other bands, please provide justification for your views.</p>	<p>Confidential? – Y / N</p>
<p>Question 3: What are your views on the suitability of the currently identified bands for HAPs and do you think there is a requirement for additional spectrum? Recognising that we support 26 GHz as a global band for IMT under agenda item 1.13, what are your views on the bands currently under study for HAPs, both globally and in ITU-R Regions?</p>	<p>Confidential? – Y / N</p>

<p>Question 4: What are your views on the bands within scope of Agenda Item 1.16 and their suitability for Wi-Fi and Wi-Fi like services? Do you agree that Ofcom should support the CEPT position of No Change? If not, please provide evidence to support your view.</p>	<p>Confidential? – Y / N</p>
<p>Question 5: Do you agree that UK support the inclusion of the updated Recommendation M.1849-1 (“Technical and operational aspects of ground-based meteorological radars”) in footnote No.5450A? What are your views on the requirement to include a reference to ITU-R Recommendation ITU R M.1638 1 in footnotes No.5447A and 5.450A and the potential impact upon Wi-Fi (and similar technologies)?</p>	<p>Confidential? – Y / N</p>
<p>Question 6: Do you agree that UK support a position of not making changes to the Radio Regulations to reference specific bands for M2M/IoT usage?</p>	<p>Confidential? – Y / N</p>
<p>Question 7: What are your views on the potential removal of the limitations listed above?</p>	<p>Confidential? – Y / N</p>
<p>Question 8: What are your views on the approach we are proposing to take in respect of ESIMs and are there any additional factors that you think we should take into account?</p>	<p>Confidential? – Y / N</p>

Question 9: What are your views on the establishment of regulatory provisions, in Article 22, that cover non-GSO operation between 37.5 and 51.4 GHz?	Confidential? – Y / N
Question 10: What are your views on the various issues under consideration under Agenda Item 7, particularly in respect of the bringing into use of non-geostationary satellite networks (i.e. Issue A)?	Confidential? – Y / N
Question 11: What are your views on Agenda Item 9.1.1?	Confidential? – Y / N
Question 12: What are your views on the potential establishment of satellite pfd limits, in the 1 452 – 1 492 MHz band, to protect terrestrial use?	Confidential? – Y / N
Question 13: Do you have any views on the bands being studied and are there any other considerations which you think should be taken into account? What are your views on the appropriateness of the current emission limits in the band 3 700 – 4 200 MHz?	Confidential? – Y / N

Question 14: Do you agree that no changes to the RRs are required, under Agenda Item 9.1.7, and that managing the unauthorised operation of earth station terminals (deployed within its territory) should be addressed by the national administration concerned?	Confidential? – Y / N
Question 15: What are your views on the need for additional fixed satellite service allocations in the band 51.4 – 52.4 GHz?	Confidential? – Y / N
Question 16: What are your views on Agenda Item 1.8, particularly the need to enhance maritime safety, set against the need to respect the international spectrum allocations and the protection of passive services in adjacent bands?	Confidential? – Y / N

Question 17: What are your views on Agenda Item 1.9.1, particularly the need to respect the current integrity of the AIS?

Confidential? – N

The GLA support this agenda item which recognises the need to identify and support the use of alternative spectrum for 'autonomous maritime radio devices' (AMRD) used for purposes other than maritime safety and navigation. Therefore the GLA encourage Ofcom to strongly support this agenda item.

AIS is an important aid to maritime safety. The GLA consider the use of AIS frequencies as inappropriate for purposes other than maritime safety and navigation information.

The use of AIS frequencies by AMRD is proliferating and places a burden on the limited AIS bandwidth which may hinder the operation of AIS for safety purposes. The GLA is concerned that the proliferation of AMRD is a safety issue and that AMRD manufacturers may perceive AIS as a free communications channel.

It is however, noted that one of the proposed methods to satisfy this agenda item (namely 'Method B3' as published in the ITU document 'Annex 3 to Document 5B/538-E') makes use of frequencies in the range 161.4375-161.4875 MHz. These frequencies are being considered for use in VDE-SAT communications, therefore 'Method B3' is not supported by the GLA. Methods B1 and B2 are supported by the GLA.

The GLA are disappointed Ofcom is currently taking this agenda item to WRC-19 as a low priority and, considering this is a safety matter, would like this to be given higher priority to help protect the integrity of AIS.

Question 18: What are your views on Agenda Item 1.9.2, particularly the need to take into account current national users in the bands defined by RR Appendix 18?

Confidential? – N

The GLA recognise the ability of the VHF Data Exchange System (VDES) to enhance maritime safety and data communications as well as help reduce the data burden on AIS.

The GLA recognise that VDES, unlike AIS and DSC, has sufficient bandwidth to support cryptographic authentication; noting that this function is essential for maritime communications to develop safely; permitting services such as authenticated virtual aids to navigation.

Other proposed VDES applications given by the 'International Association of marine aids-to-navigation and Lighthouse Authorities' (IALA) include a series of safety, environmental protection, traffic management and navigational services (IALA Guideline 1117).

The satellite component of VDES is considered necessary to enable over-the-horizon communications and support communications in VHF blind spots, thereby enhancing the UK maritime authorities' ability to convey (authenticated) data to the mariner. As such, the GLA encourage Ofcom to strongly support the approval, and allocation, of VDES satellite frequencies at WRC-19.

The GLA are in favour of IALA VDES 'frequency plan alternative 2' as published in the ITU document 'Annex 27 to Document 5B-538-E'. It is understood this frequency plan has no impact on the existing users of Appendix 18 (maritime VHF) frequencies or users of nearby frequencies (users of frequencies in the range 160.9625 - 161.4875 MHz being protected from the VDE-SAT downlink through the use of a power flux density mask, as shown by the NORSAT-2 trials).

If however, 'frequency plan alternative 2' is not acceptable to others at WRC-19, the GLA would prefer to see another plan accepted over no frequency allocation being made.

The GLA are disappointed Ofcom is currently taking this agenda item to WRC-19 as a low priority and, considering the potential safety and economic benefits to the UK maritime community, would like this to be reconsidered and a stronger position adopted.

Question 19: What are your views on Agenda Item 1.10 and do you think that any changes to the Radio Regulations may be necessary?	Confidential? – Y / N
Question 20: What are you views on Agenda Item 1.11, and do you agree that no specific identification for rail communications is required in the Radio Regulations?	Confidential? – Y / N
Question 21: What are you views on Agenda Item 1.12 and do you agree that there is no requirement for specific identification to ITS in the Radio Regulations?	Confidential? – Y / N
Question 22: What are you views on Agenda Item 9.1.4 concerning radiocommunications for sub-orbital vehicles?	Confidential? – Y / N
Question 23: What are your views on Agenda Item 1.1, recognising that licensed amateur operators in the UK already have access to parts of the 50 – 54 MHz band?	Confidential? – Y / N

Question 24: What are your views on Agenda Item 1.2 concerning power limits for MetSat, Mobile Satellite and EESS, and the linkage to agenda item 1.7?	Confidential? – Y / N
Question 25: What are your views on Agenda Item 1.3, particularly on any limits required to protect terrestrial use?	Confidential? – Y / N
Question 26: What are your views on Agenda Item 1.7 considering spectrum needs for short duration satellites, noting also the potential linkages to Agenda Item 1.2?	Confidential? – Y / N
Question 27: What are your views on Agenda Item 1.15, particularly on the protection needs of passive services?	Confidential? – Y / N
Question 28: What are your views on Agenda Item 9.1.6, particularly on the categorisation of WPT and whether WRC action is required?	Confidential? – Y / N

Question 29: Do you have any comments concerning the Standing Agenda Items, where not covered elsewhere in this document?	Confidential? – Y / N
Question 30: Are you aware of any specific issues, not covered elsewhere in this document, which are likely to be raised in this part of the Director’s Report and of which you think Ofcom should be aware?	Confidential? – Y / N
Question 31: Do you have any comments on Agenda Item 9.3 considering Resolution 80?	Confidential? – Y / N
Question 32: What changes to the Radio Regulations have you identified that would benefit from action at a WRC and why? Do you have any proposals regarding UK positions for future WRC agenda items or suggestions for other agenda items, needing changes to the Radio Regulations, that you would wish to see addressed by a future WRC?	Confidential? – Y / N