

## Your response

Question	Your response
<p><b>Question 1: Do you agree with the prioritisation of the agenda items, as shown in Annex 5, and if not why?</b></p>	<p>Confidential? - N</p> <p>I consider there is potential for AI 9.1.6 to lead to a widespread raising of the noise floor at LF and HF, which would impact on many radiocommunication users. Thus, I question whether prioritisation should be raised to 'high' to reflect the strategic nature of such an outcome.</p>
<p><b>Question 2: Ofcom is supporting the following three priority bands for IMT identification in the RRs:</b></p> <p>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> <p><b>If you don't agree with any of these bands, or think we should be promoting other bands, please provide justification for your views.</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>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?</b></p>	<p>Confidential? – N</p> <p>No Comment</p>

<p><b>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.</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>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)?</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>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?</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>Question 7: What are your views on the potential removal of the limitations listed above?</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>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?</b></p>	<p>Confidential? – N</p> <p>No comment</p>

<b>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?</b>	Confidential? – N  No comment
<b>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)?</b>	Confidential? – N  No comment
<b>Question 11: What are your views on Agenda Item 9.1.1?</b>	Confidential? – N  No comment
<b>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?</b>	Confidential? – N  No comment
<b>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?</b>	Confidential? – N  No comment

<b>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?</b>	Confidential? – N  No comment
<b>Question 15: What are your views on the need for additional fixed satellite service allocations in the band 51.4 – 52.4 GHz?</b>	Confidential? – N  No comment
<b>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?</b>	Confidential? – N  No comment
<b>Question 17: What are your views on Agenda Item 1.9.1, particularly the need to respect the current integrity of the AIS?</b>	Confidential? – N  No comment
<b>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?</b>	Confidential? – N  No comment

<p><b>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?</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>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?</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>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?</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>Question 22: What are you views on Agenda Item 9.1.4 concerning radiocommunications for sub-orbital vehicles?</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>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?</b></p>	<p>Confidential? – N</p> <p>I would urge the UK to be active in supporting its CEPT partners for a globally harmonised allocation between 50 – 54MHz.</p> <p>This should be for a Primary Amateur allocation between 50.0 and 50.5MHz and a Shared Amateur allocation in at least the rest of 50 – 52MHz and ideally also 52 – 54MHz.</p>

<b>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?</b>	Confidential? – N  No comment
<b>Question 25: What are your views on Agenda Item 1.3, particularly on any limits required to protect terrestrial use?</b>	Confidential? – N  No comment
<b>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?</b>	Confidential? – N  No comment
<b>Question 27: What are your views on Agenda Item 1.15, particularly on the protection needs of passive services?</b>	Confidential? – N  No comment

**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? – N

Results already published in CEPT working documents show that spurious emissions from WPT-EV installations will very seriously raise the background noise levels in all environments, where there are WPT-EV installations, at frequencies up to 10MHz and beyond. Given the density of likely deployment of WPT-EV, few premises will be out of range of this spurious emission noise, with a consequent harmful impact on the operation of radiocommunication services.

I am unaware that studies have considered the potential for aggregation of spurious harmonic emissions at LF and HF that are then propagated via the ionosphere. My concern is that, due to the high-power and likely numbers of installations, the spurious emissions propagated via the ionosphere from centres of population at HF might be of such a level to exceed the man-made noise-floor. This might be expected to be where there are no other local sources of noise, such as in some 'Quiet Rural' areas and in International Waters at sea.

I agree with the view that WPT-EV should be considered within the Radio Regulations, although not as ISM, and would urge Ofcom to

- a) Seek an overall reduction in the spurious emission levels through standards and compliance testing of installations;
- b) Consider the adoption of a spot frequency for WPT-EV operation (to keep the harmonic spurious emissions in more defined parts of the LF and HF spectrum);
- c) Encourage ITU to study the far-field spurious emissions of LF and HF harmonics (aggregated contribution via ionospheric propagation)

<p><b>Question 29: Do you have any comments concerning the Standing Agenda Items, where not covered elsewhere in this document?</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>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?</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>Question 31: Do you have any comments on Agenda Item 9.3 considering Resolution 80?</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>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?</b></p>	<p>Confidential? – N</p> <p>No comment</p>