

**Question 1: Do you agree with our proposal to exempt the land use of 406 MHz PLBs from the need to hold a Wireless Telegraphy Act licence?:**

NATS recognises that Ofcom is consulting on the exemption from the need to hold a WT Act licence for a 406 MHz PLB for use on land (potentially including a 121.5 MHz or 243 MHz secondary homing signal) and is not consulting on the land use of PLBs per se.

NATS (En Route) plc, "NERL", operates the UK aeronautical Alert and Fixing (A&F) service as required in the NERL Air Traffic Services Licence (issued under the Transport Act) that comprises a network of 121.5 MHz direction finding and communications equipment. Although we are a system provider to the MoD, NATS cannot comment on the potential impact of this proposal to MoD operations on 243 MHz.

NATS sees merit in extending use of PLBs to land use, subject to there being appropriate mechanisms for the rescue authorities to respond to land based activation. We do however have concerns relating to a potential additional source of ground based transmissions on the aeronautical emergency frequency 121.5 MHz, as used by a secondary homing beacon in certain PLBs, where these may be picked up by the A&F network and have an impact on NERL's ability to meet its Licence obligations. The system is required to respond to the reception of airborne signals and we are not currently aware to date of any land use of such beacons being picked up by the network.

NATS has no objection to the licence exemption proposal, subject to the requirement being met for registration of each beacon under an appropriate regime. If this licence exemption was to lead to a proliferation of alerts on the A&F safety of life service then we would ask Ofcom to re-visit this non-aviation use of 121.5 MHz.

NATS also has the following comments in relation to Table 3.1 of the draft IR2084 currently available on the Ofcom website.

Section 5: According to ETSI standard EN 302 152, the requirements quoted for modulation depth, duty cycle and audio modulation frequency also apply to the 121.5 MHz signal. This is not clear from the layout of the text in this section of the table and this should be clarified.

Section 7 states that the maximum peak EIRP "should be less than 100mW". NATS proposes that the text should make this a requirement that the level "shall be less than 100mW".

Similarly in section 13 of this table, there is a reference to a registration of the beacons. This states only that registration "should" be carried out and NATS proposes that this should be strengthened to a "shall" to formally require such registration.

**Question 2: Do you agree with our proposal to exempt the use equipment for safety-related ITS infrastructure from the need to hold a Wireless Telegraphy Act licence?:**

No comment

**Question 3:Do you agree with our proposal to exempt the use of terminals operating in the 3400 to 3800 MHz band from the need to hold a Wireless Telegraphy Act licence?:**

No comment

**Question 4:Do you agree with our proposals for the authorisation of 2 GHz MSS user terminals from licensing?:**

No comment

**Question 5:Do you agree with our proposal to exempt the use of terminals forming part of the Apollo network by a network station user exemption?:**

No comment

**Question 6:Do you agree with our proposed changes to the current exemption regulations to permit use of non-specific SRDs at 138.2 to 138.45 MHz?:**

No comment