

Consultation response form

Your response

Question	Your response
<p>Question 1: Do you have any comments on our proposal to make Medium Power licences (42 dBm EIRP, up to 10m height) commonly available in urban areas across most of the UK, for the 3.8-4.2 GHz and 1800 MHz bands?</p>	<p>Confidential? – N</p> <p>We disagree with the proposal to allow medium power licences in urban areas in both the 1800 MHz and 3.8-4.2 GHz band.</p> <p>1800 MHz band</p> <ul style="list-style-type: none"> • The justification that the new coordination approach allows more spectrum to be made available does not hold in relation to the 1800 MHz band. • Ofcom has made no attempt to assess the potential impact of allowing higher powers in the 1800 MHz band on adjacent DECT services and applications. In fact, Ofcom makes no reference to DECT operating in the 1880-1900 MHz band. <p>Ofcom indicates that the justification for this increase in power is that adoption of new coordination criteria means more spectrum is available in urban areas, and therefore there is less chance of one user foreclosing access to spectrum for another user. This argument may be true in the 3.8 GHz band but cannot be the case in the 1800 MHz band where there is only a single 3.3 MHz channel.</p> <p>Therefore, the chance of a single 1800 MHz Medium Power user foreclosing opportunities for others is high – once the only available channel is in use in an area it becomes unavailable for another user.</p> <p>Allowing medium power in urban areas in the 1800 MHz band will reduce opportunities for other users which is contrary to the shared access policy objective to enable more users to access spectrum for their local connectivity needs.</p>

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	<p>The 1800 MHz band sits immediately adjacent to the DECT harmonised band at 1880-1900 MHz. This band is extensively used for many applications, particularly cordless audio telephony in domestic and business premises. Many of these business use-cases include public and workplace safety, hospitals, supermarkets and retail parks. In addition, the DECT band is also used for wireless microphones and talkback systems (that have migrated to the DECT band as spectrum in other bands that supported these applications has been reallocated to mobile). These example use-cases include indoor and outdoor applications, and therefore an assumption that building entry loss will help mitigate the risk of interference does not hold true for these outdoor applications.</p> <p>In the 2015 analysis to look at the potential impact of deploying LTE in the frequency bands 1781.7-1785 MHz paired with 1876.7-1880 MHz (in relation to the variation request by Talk Talk on its concurrent spectrum access licence), Real Wireless concluded that there was a risk of interference to adjacent DECT from LTE at 34.3 dBm EIRP. An increase of approximately 8 dB will increase the potential for adjacent channel interference into DECT.</p> <p>Urban areas are where we see the greatest use of DECT. With the proposal in this consultation to allow Medium Power in urban areas, it is reasonable to assume that the risk of adjacent channel interference to DECT will increase, with a consequential impact to DECT users.</p> <p>We note in your Spectrum Management Strategy (2020) you highlight the need for more sharing, and state:</p> <ul style="list-style-type: none"> • "...so long as we can achieve this without unreasonably degrading the quality of services provided. This relies upon an assessment of how close together these different users can be without causing material impacts to each other." <p>Ofcom has provided no assessment of Medium Power use in the 1800 MHz band to DECT – and makes no reference at all to this interference scenario. DECT Forum is of the view, therefore, that before any consideration of Medium Power use in urban areas should be subject to a proper assessment of the risk and impact to adjacent DECT. Only in this way can a responsible spectrum management decision be made.</p>

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	<p>3.8 – 4.2 GHz</p> <p>As for the 1800 MHz band, DECT Forum is of the view that Medium Power use in urban areas is contrary to the policy objective of Shared Access Licensing. Higher powers will sterilise larger areas, and in areas with 200 MHz available this would only support 2 x 100 MHz channels.</p> <p>Ofcom highlights that there is a need to maintain the current policy (with respect to Medium Power use in urban areas) in London, i.e. Medium Power use only under the exceptions process. Ofcom has not provided information on the criteria for this assessment that shows London is a different case to Birmingham, Manchester, Glasgow, Cardiff and all other cities and recognised urban areas in the UK. We therefore request that Ofcom provides more information on this so that stakeholders can form an informed view on this policy proposal.</p> <p>In a shared spectrum environment, operating at lower powers provides greater opportunity for more users to access spectrum. Given that the power limit in the Low Power licence has had a 3 dB uplift, it may be more prudent to see how this affects applications in the band before deciding on an increase in power.</p>
<p>Question 2: Do you have any comments on our proposed balancing measures:</p> <p>i) to continue to only grant Medium Power licences in the Greater London area (as defined in our mm Wave work) by exception, applying the ‘premises sterilisation’ test?</p> <p>ii) to apply a 100 MHz limit to the amount of spectrum a licensee can transmit at Medium Power in a particular urban area?</p> <p>iii) to apply a new price as part of this liberalisation, set at £160 per 10 MHz for Medium Power licences in urban areas?</p>	<p>Confidential? – N</p> <p>As noted in Q1, DECT Forum does not support Medium Power use in urban areas. However, to respond to Q2:</p> <ol style="list-style-type: none"> i. Ofcom has provided no supporting evidence to show that Shared Access Licensing is more constrained or more widely used in London than any other city in the UK, or that London sees disproportionately higher instances of licence request rejections than other cities. DECT Forum is therefore of the view that Medium Power by exception remains in place and should apply to all urban areas. ii. It is not clear on what basis the criterion of 500 m is derived (paragraph 5.14 (a) (iii)) – this distance seems too small, and we request more information on this to understand Ofcom's thinking. From the proposal, it seems that if the second station was more than 500 m away from the first it would not be considered within the 100

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	<p>MHz limit.</p> <p>If a user is operating at Medium Power their coverage area would likely be greater than 500 m radius, which suggests there would be little need to deploy another site within that range. On this basis it seems like the range proposed over which the 100 MHz limit applies is way too small, and should be significantly larger to align more closely with the area of sterilisation than an arbitrary distance of 500 m.</p> <p>We request Ofcom provides clarification on this to allow stakeholders to have an informed opinion and response before any decision is taken.</p> <p>iii. DECT Forum agrees that Medium Power licences in urban areas should be subject to an increase in licence fee.</p>
<p>Question 3: Do you agree with our proposal to remove the TRR in relation to Low Power outdoor base stations in 3.8-4.2 GHz?</p>	<p>Confidential? – N</p> <p>Agree</p>
<p>Question 4: In relation to our impact assessment, do you agree with our assessment of the potential impact of the further proposals we are making?</p>	<p>Confidential? – N</p> <p>The DECT forum does not agree with the impact assessment.</p> <p>The impact assessment presented in the statement and further consultation reads more like a summary of the proposals and it is not clear what, or how, an impact assessment has been carried out. This is particularly the case for the proposal on allowing Medium Power use in urban areas in the 1800 MHz band, where there is no assessment on the impact to DECT in the adjacent band.</p>
<p>Question 5: In relation to our equality impact assessment, do you agree with our assessment of the potential impact of the further proposals we are making on specific groups of persons?</p>	<p>Confidential? – N</p> <p>Agree</p>
<p>Question 6: In relation to our Welsh Language impact assessment, do you</p>	<p>Confidential? – N</p>

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<p>agree with our assessment of the potential impact of our further proposals on the Welsh language?</p> <p>Do you think our further proposals could be formulated or revised to ensure, or increase, positive effects, or reduce/ eliminate any negative effects, on opportunities to use the Welsh language and treating the Welsh language no less favourably than English?</p>	<p>Agree, and we do not think the proposals need to be revised in relation to the Welsh language</p>
<p>Question 7: Do you have any further comments on our proposals?</p>	<p>Confidential? – N</p> <p>No further comments</p>