

Your response

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<p>Question 1: For future outdoor use of 26 GHz, do you agree that the proposed exclusion zones will provide appropriate protection to the 6 radio astronomy sites? If not please explain your reasons for this providing any supporting evidence.</p>	<p>Confidential? – Y / N</p> <p>No response</p>
<p>Question 2: For indoor use of 26 GHz, do you agree that additional measures are not needed to protect radio astronomy sites and that we should remove the existing 1 km exclusion zone around Jodrell Bank and Cambridge from the current 26 GHz indoor-only shared access licence product? If not, please explain your reasons for this providing any supporting evidence.</p>	<p>Confidential? – Y / N</p> <p>No response</p>
<p>Question 3: Do you agree with our proposal to limit the number of 26 GHz base stations in 24.25-25.05 GHz to protect EESS (passive) use at 24 GHz? If not, please explain your reasons for this providing detailed supporting evidence.</p>	<p>Confidential? – No</p> <p>We have seen and endorse the comments submitted by the Met Office, UKSA and ESA. We think the proposal is a necessary but not sufficient step forward.</p> <p>We strongly support the Met Office, UKSA and ESA submissions assertion that we need to eliminate the risk of harmful interference to the EESS 23.6-24 GHz band. Harmful emissions in this band risk undermining operational weather forecast skill, disaster risk reduction and climate monitoring services. There remains uncertainty whether agreed protection following the WRC-19 agreement is sufficient because, as noted by UKSA and the Met Office, calculations in the EESS community showed a higher level of protection (-42 dBW/200MHz) than agreed at WRC-19 (-39 dBW/200MHz) is needed. We therefore support all</p>

	<p>efforts to afford more protection to the critically important EESS band.</p> <p>It is also worth noting that ECMWF has recently substantially increased use of microwave imager data over land, in alignment with the “all-sky, all-surface” strategy published here: https://www.ecmwf.int/sites/default/files/elibrary/2021/ecmwf-strategy-2021-2030-en.pdf</p> <p>This further increases the importance of these imager bands such as 24 GHz over land, over and above the value they had at the time of WRC-19. This will have to be reversed if the observations become untrustworthy.</p>
<p>Question 4: Do you agree with the technical analysis set out in Annex 2? If not, please explain your reasons for this providing detailed supporting evidence.</p>	<p>Confidential? – No</p> <p>We have seen and endorse the comments submitted by both the Met Office and UKSA.</p> <p>In particular we note that counting a 2 dB margin for manufacturing is double counting, as it was also an argument to agree -42 dBW/200MHz first and then -39 dBW/200MHz. So this margin was already taken into account.</p> <p>We also note that whether an IMT station is immediately adjacent to the EESS band, or at 2 GHz from the passive band, if the unwanted emission is -39 dBW/200MHz, you will see -39 dBW/200MHz in the sensor for both case. So if you relax for stations at 2 GHz, you will have more potential interference. Of course moving away from the edge, it should probably be easier for it to be compliant with -39 dBW/200MHz. But the requirement for protection in 23.6-24 GHz is unchanged.</p>