

## Your response

Question	Your response
<p><b>Question 1:</b> Do you agree in principle with our proposal to introduce a new licence product to enable authorisation of the use of the 90 110 kHz band for eLoran services?</p>	<p>Confidential? – This answer is not confidential</p> <p>RethinkPNT is a PNT consultancy company and provides strategy and engineering consultancy. It supports the proposal to introduce a new licence product in the 90-110kHz band.</p> <p>A licence product for this band will enable commercial PNT services to be developed, strengthening the ability of the UK to operate with resilient PNT.</p>
<p><b>Question 2:</b> Are you aware of any alternative current or future uses for the 90 110 kHz band, including any which might preclude use of these frequencies for eLoran? If so, please provide details.</p>	<p>Confidential? – This answer is not confidential</p> <p>No</p>
<p><b>Question 3:</b> Do you agree with the non technical conditions we propose to include in the new 90 110 kHz licence? If not, please set out your reasons and provide any relevant evidence.</p>	<p>Confidential? – This answer is not confidential</p> <p>RethinkPNT agrees with the non-technical licence conditions.</p> <p>RethinkPNT does suggest that the language for the licence be clarified as to the use of “no interference no protection”. Whilst we recognise the norm of this phrase, there is the potential for confusion as one interpretation is that should a licence holder comply with the no interference part, but another licence holder start to interfere, then the implication is that OFCOM will not address the interfering licence holders breach of licence at all. We suspect this is not what OFCOM means, therefore a clarification or supporting statement may be useful to strengthen the OFCOM approach.</p>

**Question 4:** Do you agree with the technical conditions we propose to include in the new 90 110 kHz licence? Please set out your reasons and provide any relevant evidence.

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RethinkPNT believes that the power restriction of 400kw might limit the availability of certain PNT applications in difficult to reach or high EMI locations. This is particularly true for decoding of the LORAN Data Channel (LDC) which requires no less than 10dB to be decoded.