Your response

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Question 1: 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?	Confidential? – N Yes Positioning system resilience for critical infrastructure and transport needs to be improved. There is no single system that can provide all the answers. In the mix of possible solutions, however, eLoran has some unique advantages and RIN supports its inclusion.
Question 2: 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.	Confidential? – N Not aware.
Question 3: 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.	Confidential? – N Overall yes. Our comment is to consider carefully the impact any conditions on the duration of the licence and also the termination notice period may have on the market and willingness to invest. Navigation systems operate on long time horizons for investment and for user-adoption. eLoran would be no exception in our view. Confidence of the supply chain is vital to ensure investment, whether from systems infrastructure suppliers, receivers, integrators, users. It may well be appropriate to offer an extended initial period guarantee and then a long-fuse notice period of any changes. It would not be excessive to envisage these in terms of a decade or more in our view to encourage investment and build confidence in the licence provision.

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.	Confidential? – N Yes. Please note that there is a trade-off between antenna density and transmitter power. There may be advantages to fewer antennas and this, in turn, may require higher transmitter powers than in the consultation.