Your response

Question	Your response
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? – ~~Y /~~ N Yes, entirely. As an independent consultant on radiocommunications and a contributor to the DFT radio spectrum audit for the transport sectors during 2008/9, I have been consistent in noting the need to have a resilient alternative to satellite radionavigation systems. The current situation with Ukraine has exposed the importance of precision navigation and positioning systems and the vulnerability of satellite systems to jamming and spoofing. It is interesting to note that China maintains a Loran type system covering adjacent (and likely disputed) sea areas.
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? – ~~Y /~~ N Yes, there is a threat to reception of Loran type signals from some classes of Inductive and Wireless Power Transfer equipment. As these applications have no status or corresponding frequency allocation in the ITU Radio Regulations, as regards the frequency band 90-110 kHz, there should be no disturbance to radiocommunication services and the question of "sharing" does not arise.
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? – Y /~~ N Yes, these non-technical conditions are well set out.

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? – Y /~~ N Yes, the principles are well set out. However, there may be some ambiguity as regards coexistence with short range devices covered at 4-19 – 4.21. The definition used in EU spectrum policy and CEPT, which UK respects, is that " *'short-range device' means a radio device which provides either unidirectional or bidirectional communication and which receives and/or transmits over a short distance at low power*". As such, greater emphasis and prominence should be stated in respect of the "*general 'no interference no protection' provision*" quoted at 4.21, especially as regards the necessary use of 'low power'. Moreover, the term 'low power' should be defined for the avoidance of doubt.