

Consultation response form

Consultation title	Notice of Ofcom's proposals for changes to the licence exemption for Wireless Telegraphy Devices
Organisation name	LoRa Alliance®

The LoRa Alliance welcomes the opportunity to respond to the OFCOM consultation on the "Notice of Ofcom's proposals for changes to the licence exemption for Wireless Telegraphy Devices". The LoRa Alliance generally shares views with OFCOM about harmonisation of the frequencies and technical parameters for short-range device (SRD) applications within the 874 to 876 and 915 to 921 MHz bands in line with the European Commission Decision 2018/1538/EU of 11th of October 2018.

In particular, the LoRa Alliance supports the statements from OFCOM about "the importance of SRDs for the economy and the growth in applications" and about "the many positive benefits of the decision including enhancing the maximum freedom of movement of SRDs, the continuation of the common approach to the spectrum access conditions for SRDs". Both require predictable regulatory environment, European harmonisation and cautious updates to foster investment and benefit economic growth.

Question	Your response
Question 1) Do you agree with Ofcom's proposals to implement changes, that are consistent with the SRD Decision, within the 874 to 876 and 915 to 921 MHz frequency bands for SRDs?	LoRa Alliance agrees with the implementation of the European Commission Decision 2018/1538/EU of 11 October 2018 to enable the use of the 874-876 and 915-921 MHz for SRD.
Question 2) Do the Proposed Regulations and proposed changes to IR 2030 correctly implement our proposals?	<p>While the LoRa Alliance concurs to the changes in the IR 2030, we would like to urge OFCOM to keep in all these bands the possibility of active discovery possibility to keep mobile and nomadic devices "under control". Indeed, mandating a 0% Duty Cycle for mobile and nomadic devices in these bands would make the control of the devices by the gateways more difficult, negatively impact the development of SRD and prevent a global harmonisation of SRD in these bands.</p> <p>In this context, the LoRa Alliance would like to reiterate the concerns already expressed</p>

	in CEPT and ETSI of mandating a 0% Duty Cycle for mobile and nomadic devices moving out of the coverage area or being instructed to shut down.
<p>Question 3) Do you agree with Ofcom's proposals to remove the licence exemption currently in the 2010 Regulations for Railway Level Crossing Radar Sensor Systems?</p> <p>If you disagree with any of the questions, please provide the evidence that would support any disagreement with the proposals.</p>	<p>LoRa Alliance has no specific views regarding the removal of the license exemption or the decision to license the use of the Railway Level Crossing Radar Sensor systems.</p>