

Aviat Networks

Additional comments:

Question 1: Do you have any additional information to provide to that presented in this Consultation that you believe Ofcom should consider? If so please provide clearly evidenced views. Are there any other issues that you believe Ofcom should have considered?:

Aviat Network believes that insufficient attention has been given to "new" approaches in equipment design and installation in this consultation. The nature of the propagation at these frequencies together with the antenna characteristics means that it is possible to realise some very compact equipment designs that exhibit a very low visual impact. This in turn allows deployment of the backhaul solution to be down a street level with equipment being mounted on building corners/sides and street furniture as opposed to traditional tower mounting.

In order to realise these solutions it is vital that the ETSI class 2 parameters for antennas in this band remains an option. These enable the use of compact flat panel antennas and thus an overall compact and visually unobtrusive design is achieved.

Question 2: a) Do you agree with our proposals to offer a mixed solution that allows stakeholders to choose between the currently available self coordinated authorisation approach and a new Ofcom coordinated approach for the band? b) Do you agree with the segmented band plan with the split of 2 x 2 GHz and 2 x 2.5 GHz for Ofcom coordinated and self coordinated approaches respectively? c) Is the guard band size of 250 MHz considered appropriate between the two approaches? :

(a) Aviat Networks believes that having an Ofcom coordinated approach to this band will greatly increase confidence in using this band. We have found that a number of service providers have reservations regarding the use of light licenced/licence exempt spectrum as they believe there is insufficient protection from interference. This interference can degrade the level of service to the point of users considering using other frequency bands and in some cases non radio technologies, which in some instances may not be a practical or even possible solution.

(b) Aviat Networks believes that the larger portion should be the Ofcom coordinated portion as we believe the growth application for this band will be small cell backhaul for which quality of service is paramount.

We believe that within time the capacity demands of service providers will mean that wider channels will be needed in the Ofcom coordinated portion of the band.

(c) Aviat networks believes that the size of the guard band is dependent upon whether the self coordinated section has any restrictions upon what type of system can be deployed there. If both portions of the band conform to the same band plan then there should be little need for a guard band. This is the best possible solution in terms of spectrum efficiency.

At the present time there are different harmonised standards used for equipment depending upon whether it is to be used in a fully coordinated environment or in a self coordinated/light licensed environment. This also justifies the use of a 250MHz guard band. Removing the guard band, would only be possible if all technical parameters are identical in both portions of the band and in a common band plan is implemented across the entire band.

Question 3: a) For the Ofcom coordinated part of the band, do you agree with the proposal to make available channels of 500 MHz and 250 MHz (with smaller channels being made available when the standards are completed) and to make these channels available in up to 1 GHz bandwidth in the first instance? b) Is there a requirement for channel sizes greater than 500 MHz in the coordinated block? Please submit evidence to support your view.:

(a) Aviat Networks agrees with the proposal to use 250MHz and 500MHz channels and to allow multiple contiguous channels to be concatenated up to the entire width of the coordinated portion of the band, where coordination is possible.

(b) Aviat Networks believes that providing concatenation of contiguous channels (as in 3(a) above) is allowed then individual channel sizes of greater than 500MHz are not required.

Question 4: a) Are there any aspects of the current self coordinated licensing and link registration process that could benefit from improvements? Please provide specific information and reasons for how your suggestions would improve the process. b) Should Ofcom consider mandating the CEPT channel plan, ECC/REC/(05)07 for the self coordinated block? Explain clearly the reasons to support your view. c) Are the technical parameters shown on the register sufficient to enable self coordination? Should Ofcom consider presenting additional parameters on the register? If so, which parameters and why?:

(a) Aviat Networks has concerns that the current link registration data base does not show all the systems in use. Our own market research tends to suggest a much higher number of systems sold/installed in the U.K. than can be seen from the Ofcom database. This is of great concern as this invalidates the entire self coordination process which can give rise to unexpected interference problems.

In addition, we believe that there are also registrations in place that have not been built out. This is a problem as it essentially blocks certain locations/routes from carrying traffic. A solution to this problem would be to introduce "FCC style" buildout requirements, whereby if a link isn't built within a certain period of time, the licence is revoked. We also believe that the low cost link registration fee may be factor in these cases since a £50 annual charge coupled with no buildout requirements is not much of a deterrent to registering links with the sole intention of blocking competitors!

(b) Aviat Networks believes that adopting the CEPT channel plan is desirable as this helps with equipment design by providing a common basis across the CEPT region, even more so, as the CEPT plan is now incorporated in the ITU-R Recommendation F.2006. Maintaining the current situation will lead to difficulties in coordination between systems, especially as in

some areas demand may see backhaul applications being allocated in this portion of the band as well.

(c) Aviat Networks believes that the parameters required by the current system are sufficient to enable self coordination.