

***Intellect response to Ofcom's
review of:***

***spectrum management approach in
the 71 – 76 GHz and 81 – 86 GHz
bands***

Response

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?

Intellect welcomes the detailed consideration given to the various assignment approaches. Ofcom has outlined its preferred approach of partitioning the band to facilitate the flexibility of a self coordinated approach (broadly favoured by enterprise customers) and the reliability of an Ofcom coordinated approach (favoured typically by mobile operators). We consider this a pragmatic short term solution.

However, in the longer term, Ofcom should consider an online assignment and licensing approach which will in effect bring about the 'best of both worlds' in terms of combining the flexibility of the self assignment route and the rigour and availabilities of the Ofcom assignment facility and database. Such an interactive, online arrangement will enable licence applicants to submit their frequency and licence requirements electronically or online and test the channel availabilities. The online tool could use the Ofcom's assignment criteria to assign appropriate channels and any other associated technical conditions for the applicant. The interactive element would provide the flexibility sought by some applicants while the ability to use Ofcom's assignment criteria offers the reliability sought by others – all at the same time. This will remove the need for the partitioned band and will in turn enable Ofcom to maximise innovation in its licensing processes as well as the utilisation of the band. Clearly at that stage, a unified licence fee schema would need to be re-introduced, reflective of the spectrum resources utilised.

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?

Intellect appreciates that the driver for developing the 'mixed solution' derives from 2 broad communities of users who have expressed a preference, respectively, for the flexibility of self-assignment and the certainty of the Ofcom co-ordination. Many of our member companies are supportive of the proposed approach. However some other member companies are opposed to the splitting of the band because this will preclude the future use of current products and applications using broader channel-widths.

The online assignment and licensing approach proposed above, is a more elegant and up to date approach for accommodating the above diverse requirements and would remove the need to partition the band in the future. As stated in Intellect's input to Ofcom's 2012 call for

input on its spectrum review, Ofcom should seriously consider how best this could be implemented without delaying the availability of spectrum in the 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.

Intellect supports the approach to use the CEPT Channel Plans. Member companies support the choice of 500 MHz and 250 MHz. However we are aware of a product being used by a UK operator with a requirement for higher channel widths. A non partitioned band enabled by the online assignment and licensing tool would have the flexibility to facilitate a greater selection of channel widths.

Intellect is aware that Ofcom has been in discussion with individual companies regarding the future licensing of systems using equipment with broader channel widths than in these proposals. Ofcom should bring these discussions to a satisfactory conclusion which allows the users of these systems to transition to narrow channel technologies, without inhibiting reliable access for other users to the band.

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) As previously stated, the Ofcom assignment approach, made accessible to licence applicants offers the best of both worlds in terms of the flexibility of the self assignment route and the rigour and availabilities of the Ofcom assignment facility. This way the need to partition the band is negated which will in turn instil innovation to Ofcom's licensing process and increase the utilisation of the available spectrum.

b) Intellect supports the use of CEPT harmonised channel plans.

c) Intellect has no information to add.