

# **Ofcom Consultation on 870 – 876 MHz and 915 – 921 MHz**

## **Qualcomm response**

**March 2013**

Qualcomm welcomes the opportunity to respond to Ofcom public consultation on the 870-876 MHz and 915 – 921 MHz bands.

Several independent marketing reports predict considerable market growth for SRDs applications. The SRD industry has expanded considerably over recent years and has now developed into a number of different industrial sectors. These include metering, automotive applications, alarms, and in wider terms, non-specific SRDs such as home and building automation, telemetry, data transmissions, etc. It is anticipated that the present trend in diversification and expansion will continue. New emerging applications are being constantly developed, such as SRDs for Smart Metering, Metropolitan Mesh Machine Networks (M3N), Assistive Listening Devices and new Social Alarms and Alarms.

Furthermore, according to a 2012 research report from BCC Research, the global market for wireless sensor devices will be worth \$4.7B with shipments of 1.6B units by 2016. The same study forecasts the global market for home automation and energy management will be worth \$1.1B with shipments of 410M units by 2016. Low power wireless applications have a promising future in the above segments.

As a result of that, it is expected that the current designations of spectrum for SRDs will be inadequate to meet their future needs. The frequency bands under consideration in this consultation are used or studied in many countries outside Europe for SRDs, which make them attractive for systems deployed on an

international basis leading to the benefits of global economies of scale and a support for international trade.

In the last 5 years both ETSI and CEPT have been working on the future use of the bands under consideration in this consultation and it has become apparent that a number of key applications such as SRDs, GSM-R and RFIDs can use and share these bands. CEPT work is planned to come to first conclusions of its studies in 2013.

Qualcomm would like to draw Ofcom attention on a IEEE standard under development, the so called 802.11ah designed also to address the previously mentioned SRD applications and the growing demand for Internet of Everything (IOE). Currently, the 900 MHz band (902-928) has been allocated in US, South Korea, and Japan for 11ah use.

Thus, Qualcomm welcome Ofcom consideration to release the 870 – 876 MHz and 915 - 921 MHz bands. Applications such as home automation, building automation, smart metering and healthcare will greatly benefit from Ofcom decision taking advantage of the benefits deriving from a global harmonization.

In this context, Qualcomm would like to ask Ofcom to consider and evaluate the role that this new IEEE 802.11ah standard can play in the release of the 870-876 MHz and 915-921 MHz spectrum in the UK and more widely in Europe in light of the IEEE standard technical requirements and associated benefits for the target applications. This would be particularly needed as the bandwidth requirements and power limits of 802.11ah are not currently considered in the CEPT ongoing studies.