

Sony Europe's response to Ofcom's Consultation on White Space Device requirements

In general Sony supports the approach Ofcom has taken with defining the requirements for White Space Devices.

Question 1: Do you agree with our approach to defining the various categories of WSDs?

Yes

Question 2: Do you agree with our proposed sequence of operations for WSDs?

Yes

Question 3: Do you agree with our proposed additional operational requirements for master WSDs?

Yes

Question 4: Do you agree with our proposed additional operational requirements for slave WSDs?

Yes

Question 5: Do you agree with the proposed device parameters, operational parameters and channel usage parameters?

In anticipation of the possible change in use of the "700 MHz" band (694-790 MHz) from DTT to mobile broadband, we recommend white space devices assume an upper operating frequency of 700MHz.

There doesn't seem to be any consideration of the effects of WS interference to communal antenna distribution amplifiers or domestic booster amplifiers which are likely to overload in the same way as shown in the 800MHz LTE consultation studies. Will Ofcom be including these devices in the overall protection ratios used by the WSDB?

Question 6: Do you agree with our approach of implementing the requirements in the example SI and the draft IR and VNS?

Yes

General Comments

3.17 - Making information on DTT and PMSE available to databases.

We support Ofcom's proposal to calculate TVWS availability and to pass the information onto databases. Where a database provider can demonstrate a high level of competency we would like to see the opportunity for database providers to provide advanced geo location services that take account of interference aggregation from multiple WSDs to enable specific WSD output power levels.



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5.85 – Slave antenna gain

We agree a limit must be placed on the maximum Rx antenna gain to estimate the locations of slave WSDs based on the expected coverage area of their serving master WSD.

6.3 – Sensing

We support the idea of an introduction of WSD's by phased location approach which initially could be monitored by a number of strategically position Ofcom sensing receivers.

Spectrum access priorities

TVWS spectrum available for secondary use is understood to be licence-exempt with no protection from interference and best effort access. The interaction between TVWS devices and geolocation database does provide tools to introduce tiers or priorities of accessing the spectrum. Is Ofcom considering the possibility of a tiered approach where for specific locations or times a priority is given to certain services?