Additional comments:

Weightless is developing an international machine-to-machine communications standard that is optimised for very efficient use of the radio spectrum with very low power consumption.

Weightless supports the Ofcom initiative for the introduction of white space devices utilising a geo-location database approach.

We look to Ofcom to ensure a strong alignment between UK WSD regulatory requirements and the work currently being undertaken by international standardisation bodies, for example ETSI.

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

Yes we agree. There should also be flexibility to add classes when needed as new applications are developed. Consequently there should be provision to accommodate new requirements by a simple process that can be implemented without significant delay.

We note that the use of Type B WSDs includes mobile applications, but the requirement for an integral antenna implies that for vehicle applications, where the WSD will be subjected to screening attenuation, the WSD must be mounted externally. We believe that this is too restrictive for vehicle applications and that the integral antenna requirement should be removed.

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

Yes we agree.

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

Yes we agree.

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

In general we agree, however, since the objective of device emissions class is to influence the WSDBs' choice of specific operating parameters, there is potential for the use of devices with high adjacent frequency leakage, (e.g. Class 4) to result in slave devices becoming orphaned from the initial allocation of devices. This could occur as primary use of the spectrum changes, with the result that a previously installed Class 4 device could then produce unacceptable levels of interference to a primary user. In such a case the WSDB would have no option but to bar the Class 4 device from the network.

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

Yes we agree.

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

Yes we agree and the VNS raises the following comments;

a) What is the meaning of the term "non-radio link" as used in 6.29 of the VNS? We assume this to mean a cabled RF interface. If it does mean an additional communications link between the Master and Slave units we would argue that this would place an unnecessary design constraint on equipment, resulting in additional complexity and cost.

b) The specification should make clear that the terms "spectrum analyser", "power meter", etc, refer to a device that is able to perform the stated function and not imply that the test must be performed by an instrument that is dedicated to that function.