WEIGHTLESS™

Weightless Response to:

Ofcom Strategy Consultation on UHF Bands IV and V

Weightless is developing an international machine-to-machine communications standard that is optimised for very efficient use of the radio spectrum assigned as 'white-space'. The combination of licence exemption with a geo-location validity approach provides a method of control over potential harmful interference that previously has been impossible for licence exempt devices. Furthermore a reference database provides the regulator with a very effective and agile channel for implementing changes to regulations.

Consequently we believe that this technique provides a very effective means for utilising spectrum that may be fallow due, for example, to future allocation or forthcoming spectrum auction programmes.

Weightless supports the Ofcom initiative to expedite UK spectrum policy on redeployment of UHF bands. We see this as the driver for progress in other administrations with the aim of European harmonisation to maximise availability of white space spectrum.

Answers to questions;

Other uses of UHF bands IV and V

Question 12: Are there other material factors affecting the future requirements of WSD applications that we should consider as we develop an approach to secure long term benefits from UHF band IV and V?

Response:

The factors that should be borne in mind when considering spectrum allocation priorities are;

(a) The significance of white space devices in potentially critical applications, e.g. health care applications.
(b) The quantity of M2M white space devices, potentially measured in millions.

Question 14: Are there other material factors affecting the future requirements of emergency services applications that we should be aware of as we develop an approach to secure long-term benefits from UHF band IV and V?

Response:

White space technology provides greater resilience to harmful interference than many other technologies.

Securing long term benefits for citizens and consumers

Question 16: Do you believe there is a material risk that the DTT platform will have insufficient spectrum to continue to deliver important benefits (including providing universal low cost access to PSB content) if the 600MHz band is not used for DTT when the after clearance of the 700 MHz band?

Response:

No.

Question 20: Which option(s) for releasing 600 MHz in the short term would maximise its value whilst supporting our proposed longer term objectives?

Response:

Option (a): Use of the band by white space devices (WSDs) under the control of a geo-location database provides a very efficient and flexible use of the band, particularly for meeting the spectrum requirements of potentially millions of machine-to-machine WSDs.

The wider impacts of changing the use of the 700MHz band

Question 21: Do you agree that the wider impacts of a future change of use of the 700MHz band could be managed to prevent them having a detrimental impact on consumers and the services operating in this band?

Response:

Implementation of white space devices, operating under a geo-location database, provides an effective solution to managing the prevention of any detrimental impact on other services.

Proposed approach for securing future benefits and next steps

Question 23: Have we correctly identified the main areas of future work that could follow this consultation process subject to its outcome?

Response:

Consider future spectrum requirements for white space devices in preparation for the time when they have to relinquish any short-term band assignments.