

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: **Crown Recognised Spectrum Access in 3400 to 3600 MHz**

To (Ofcom contact): **Cesar Gutierrez**

Name of respondent: **Stephen Truelove**

Representing (self or organisation/s): **UK Broadband Ltd.**

Address (if not received by email): Stephen.Truelove@ukbroadband.com

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing	<input checked="" type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

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Name

Signed (if hard copy)



Mr Cesar Gutierrez

Ofcom
Riverside House
2A Southwark Bridge Road
London
SE1 9HA.

Date: 2nd February 2011

E-mail: cesar.gutierrez@ofcom.org.uk

Dear Mr Gutierrez,

Response to Ofcom's 3400 ~ 3600 MHz RSA

We would like to thank Ofcom for the opportunity to comment on this consultation.

We recommend a fresh approach be taken for this band

The 3 GHz band has now become an important national asset in the light of the very fast increase in data traffic that has become apparent during the course of this set of consultations and the need to plan for much more spectrum hungry data networks in the future to satisfy consumer, business and public sector demand for broadband wireless. UK Broadband thus recommends a fresh approach is needed with regard to how this band is offered to the market.

The 3 GHz band – the standards are still being established

The WRC identified the 3.4 ~ 3.6 GHz band for IMT in 2007 and the European commission decision in 2008 permitted mobility across the entire 3 GHz band.

In March 2011, 3GPP will be finalising Release 10 of the LTE standards and the industry anticipates this specification to include the 3 GHz band. This will initially support channel bandwidths of up to 20 MHz, however in the future IMT advanced standards will support channel bandwidths of up to 80 MHz to 100 MHz. These high channel bandwidths will enable data rates far superior to current 3G networks.

In May 2011, ECC PT1 is due to finalise a preferred IMT channel arrangement for the 3 GHz channel, harmonising the band across Europe. This opens up the opportunity of roaming in Europe and the USA, following the announcement last year from the NTIA; that it is recommending that the 3500 ~ 3650 MHz spectrum, is made available for wireless broadband.

The hoped for inclusion in the 3GPP in March and the decision on the preferred IMT channel arrangement by ECC PT1 in May will significantly affect both the short and medium term uses for this band and the economic value of this spectrum. For this reason we recommend that no further action is taken on releasing this band until the outstanding questions are resolved later this year and the technical conditions for this band can be aligned with the European decision¹ on harmonised frequency arrangement for IMT systems in the 3400 ~ 3800 MHz range.

¹ 'on harmonised frequency arrangement for IMT systems as part of mobile/fixed communications networks (MFCN) operating in the bands 3400 ~ 3600 MHz and 3600 ~ 3800 MHz'.

We need a national strategy to maximise the development of wireless broadband networks

Given that the technical requirements for IMT Advanced services are now becoming clearer it will be important to take these into account for all future spectrum releases. We thus recommend that Ofcom develop a spectrum strategy that takes full account of both the 2.6 GHz and 3 GHz spectrum and ensures that this is released to the market in a coordinated way that maximises the opportunity to develop and operate wireless broadband networks utilising IMT Advanced services.

Need to unify the approach to guard bands

We remain concerned with the loss of the external guard band (at 3475 ~ 3480 MHz) and interference impact on our existing spectrum holdings within the band. The European commission² decision does not specify the position of the block edge mask when there is a guard band between neighbouring spectrum holders. In the Freedom 4 license variation, Ofcom specified a base station block edge mask, calculated from the centre of the guard band (at 3600 ~ 3605 MHz), this follows the guidance set out within recommendation REC (04)05³; which is the technical basis for the European commission decision. We believe the block edge masks should be calculated from the centre of the existing guard bands (at 3477.5 MHz) in a similar manner as used in the Freedom 4 license variation; as there is no justification for these guard bands to be treated differently.

Ofcom's statutory responsibilities and the release of the 3 GHz spectrum

The European commission decision clearly indicates that 'member states' are responsible for ensuring the protection of adjacent networks across the entire 3.4 ~ 3.8 GHz range and ensure its efficient use for BWA and IMT systems. We strongly believe this can only be achieved if Ofcom takes sole responsibility for the band; as Ofcom's statutory responsibility is to maximise spectrum efficiency and minimize interference.

We think it contradictory, and not in the national interest, for one party to be responsible for releasing the spectrum under its set of priorities and then another, in this case Ofcom, be responsible for the coordination of the use of this spectrum post release. This does not allow Ofcom to fulfil its statutory responsibility to maximise spectrum efficiency and minimize interference.

The MoD's 3 GHz band is a major national asset that needs to be released to the market in an open and efficient manner. The MoD has limited experience in releasing spectrum to the market, whereas Ofcom has a proven track record and expertise in spectrum management.

Ofcom already has significant experience of releasing spectrum to the market in accordance with national need. The 3 GHz band will have a very important role in the future of wireless broadband in the UK. Therefore, to ensure the nation receives the full benefit from future wireless broadband services, we recommend that Ofcom takes the responsibility for auctioning the MoD's 3 GHz spectrum on behalf of the Government.

² EC Dec 2008/411/EC - on the harmonisation of the 3400 ~ 3800 MHz frequency band for terrestrial systems capable of providing electronic communications services in the Community

³ ECC Recommendation (04)05 guidelines for accommodation and assignment of multipoint fixed wireless systems in frequency bands 3.4 ~ 3.6 GHz and 3.6 ~ 3.8 GHz.



Yours sincerely,

S. Truelove

Stephen Truelove
UK Broadband