

Ashby, Mr R.

Question 1: Have we got the scope right? Is the set of networks, services and operators we propose to report on appropriate and is our approach to data gathering and analysis correct?:

The business radio sector appears to have been overlooked.

There are primarily three types of business radio communications:

1: Wide area Trunked radio systems. These typically cover an area of around 15 miles, with the exception of the Fleetcomm network. This is publically accessible, covering from North Yorkshire to the South Coast. This accounts for a large proportion of business communications

2: Local non-trunked radio systems. These are lower range (typically 5-10 miles), and are used by business such as taxicabs.

3: On-site communications. These are used by warehouse operatives, hospital workers, etc.

I feel these must be included since the number of users of the business radio is quite significant.

The amount of radio spectrum, of which is primary interest to Ofcom, used by these services is large compared to cellular networks.

Question 2: Do you agree with our approach to classifying different types of networks and services? Are there better ways to define them?:

Question 3: Do you agree with our proposal to prioritise 2G mobile coverage and broadband speeds for the first report?:

Overlooked are the wide-area trunked radio networks, such as Fleetcomm.

There are also private wide-area trunked networks, which are hugely spectrum inefficient, such as London Transport, West Midlands Transport, etc.

Question 4: Do you agree with our proposed reference date for the report as a date in June 2011 and are we allowing enough time for the provision of data?:

Yes

Question 5: How can we improve the comparability of data between different operators?:

In particular to the business radio sector, which uses a huge amount of spectrum, inefficiently, the amount of channel utilisation should be requested.

Correctly engineered wide area Trunked systems, such as Fleetcomm, provide extremely good spectral efficiency.

However, taxicabs, etc, use a huge amount of spectrum extremely inefficiently. This should be looked at, and these systems should be incentivised to migrate to more efficient technologies, such as Trunked radio systems

Question 6: Do you agree with our approach for reporting on the use of electromagnetic spectrum?:

No Comment

Question 7: Do you agree with our approach to measuring coverage?:

No Comment

Question 8: How do you think we should establish an appropriate level of granularity and the right technical assumptions to make the data useful?:

No Comment

Question 9: Do you agree our proposed approach will enable us to report adequately on arrangements for infrastructure sharing? Are there reasons why network operators would be unable to provide us with the data we have proposed to collect?:

No Comment

Question 10: Do you agree our proposed approach will enable us to report adequately on the provision of wholesale network access? Are there reasons why network operators would be unable to provide us with the data we have proposed to collect?:

No Comment

Question 11: How do you currently measure the capacity of the network?:

No Comment

Question 12: Do you agree that we should define specific metrics for different types of networks?:

No Comment

Question 13: Do you agree with the proposed approach of gathering specific reports of outages above a certain threshold, and how do you think such thresholds should be set?:

No Comment

Question 14: For smaller outages, which statistical data do you think it is valuable to gather?:

No Comment

Question 15: Is a three-month reporting period sufficient to assess availability performance? :

No Comment

Question 16: Do you agree with our approach to reporting resilience and emergency planning and the list of data we would ideally collect from CPs?:

No Comment

Question 17: Do you already provide information to other organisations and government agencies around resilience issues? If so, what are they?:

No Comment

Question 18: Do you agree that there are additional networks and services which are of sufficient importance to include in the report? If so, what are they?:

No Comment

Question 19: Are there other sources of international data which we should consider? Are we focusing on the right networks and metrics? In particular, have we got the right metric for commenting on next-generation access deployments?:

No Comment