

WiTNESSS (Wireless Technologies for Novel Enhancement of Systems and Structures Serviceability) collaborative project: TRW Conekt, Westland Helicopters Limited, BAE Systems (Operations) Ltd, Ultra Electronics Electric Test Solutions, Bombardier Aerospace, GE Aviation Systems Ltd, System Level Integration Ltd, Airbus Operations in the UK, QinetiQ, QM Systems Ltd, Rolls-Royce PLC, HW Communications Ltd.

**Question 1: Do you agree with our proposal to permit railway level crossing radar sensor systems to operate in the UK, on a licence exempt basis, providing that exclusion zones are put in place to protect Radio Astronomy sites?.**

We have no response as this is outside of our scope.

**Question 2: Do you agree with our proposal to exempt users of HDFSS equipment operating with e.i.r.p. no greater than 55 dBW in the 27.50 to 27.8185 GHz, 28.4585 to 28.8265 GHz and 29.4625 to 30 GHz bands from the need to possess a wireless telegraphy licence?.**

We have no response as this is outside of our scope.

**Question 3: Do you agree with our proposal to permit underwater SRD systems to operate in the UK, providing in-air emissions meet the present limitations for licence-exempt use?.**

We have no response as this is outside of our scope.

**Question 4: Do you agree with our proposal to remove restrictions where a more liberal duplication of the regulations exists elsewhere in the UK licence exemption regulations and incorporate all relevant information for licence exempt SRD into a single Interface requirement document?.**

Yes. This will simplify documentation, allowing greater understanding.

We are particularly interested in the proposed details for 3.36.4 and 3.36.6, which could concern Ultra-Wide Band (UWB), and obviously should be taken in connection with section 5.

3.36.4 Remove airborne restrictions for all technologies at 2.4 GHz and 5.8 GHz, where these restrictions have been previously removed from the Non-Specific SRD regulations; and for Wireless Access Systems at 5 GHz.

3.36.6 Remove the caveats on channel spacing/bandwidth in paragraph 3.6 of the September 2008 version of IR2030, as it may be possible for equipment to operate in other ways without causing undue interference. The applicable ETSI standard will contain the appropriate channel spacing.

The recent and upcoming EC decisions given in Section 5 of the document on both

SRDs (Short Range Devices) and UWB (Ultra-Wide Band) technologies for inclusion into the OFCOM regulations indicate that further changes may need to be made. It is with this in mind that the WiTNESSS project would like to indicate an interest in using UWB systems for data transfer with low power wireless systems. This is within the scope of the response to SRD technology, with UWB as a possible basis for an SRD system.