

Title:

Mr

Forename:

Brian

Surname:

Copsey

Representing:

Self

Organisation (if applicable):

Email:

BC@copsey-comms.com

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Whilst wishing to see flexible and efficient use of spectrum, the incumbent equipment in this band is domestic receive only television, served by individual aerials or communal aerials plus Cable Networks. No consideration (or very little) of the interference issues were considered in the CEPT work on the 790-862 MHz allocation. Neither was there an impact assessment which should have considered the cost to society and individuals of the reallocation, in this case a full impact assessment which considers the full cost of replacing,

filtering or reengineering the existing users must be carried out.
If block edge masks are to be used they must ensure full protection of existing users.

Question 1: Do you have any comments on the application of the protection clause to all new licences for the 600 MHz band and geographic interleaved spectrum?:

The protection clause must be robust enough to provide compensation or replace domestic and professional equipment displaced or interfered with by the new licence holder.

Question 2: Do you have any comments on our approach to technical licence conditions for the 600 MHz band and geographic interleaved spectrum?:

Yes, comprehensive OOB and spurious limits in line with the existing broadcast band limits must be observed unlike the situation that has been allowed with the 790-862MHz band. Consideration of the proposed power limits on existing communal aerial and cable networks should be, must be a priority.

Question 3: Do you have any evidence using frequency offsets with DVB-T2 EC signals might have an adverse impact on uses of adjacent interleaved spectrum?:

Question 4 Do you have any evidence mobile services using the 600 MHz band and geographic interleaved spectrum could cause harmful interference to cable television?:

YES, please refer to the Cable Europe Test reports, it is the customer premises equipment which has the problem, NOT the cable network. In addition please see the Dutch and German administration reports.

In the case of communal aerial systems the interference will be into the head end and floor level distribution amplifiers, in addition to proximity of new terminal units to existing TVs etc.

In the case of domestic installations using head end amplifiers the interference will be generated within the aerial/amplifier combination.

All of the above are covered in published reports.

Question 5: Do you have any comments on protecting PMSE in channel 38?:

YES, as stated previously this channel should be protected by strict OOB and spurious limits.

Question 6: Do you have any comments on non-technical licence issues and the way we propose to approach them?:

Please ensure that the wording protects adjacent channels and other users. What action can end users expect if interference is experienced and the matter is reported to Ofcom? Will end users be subject to a fee or any costs associated with remedial action if it is determined necessary? Will the radio investigation service charge a fee for attending the premises? This would appear unreasonable under the circumstances.

Question 7: Do you have any comments on our assessment of the most likely uses of the 600 MHz band and geographic interleaved spectrum? Are there any potential uses we have not mentioned that should be considered?:

It is not the uses but the "interference" to existing and adjacent users which must be properly assessed before the use is defined and licence is granted.

Question 8: Are there any distinctive considerations and uses for this spectrum in the nations and regions of the UK?:

Radio microphones

Question 9: Do you have any comments on our continued inclusion of channel 36 in the award of the 600 MHz band?:

Question 10: Do you have any comments on our intention to maintain a market-led approach to awarding the 600 MHz band and geographic interleaved spectrum?:

No, providing the interference issues are fully explored and solutions found before the licence is granted.

Question 11: What information can you provide on packaging and award design considerations?:

Question 12: When would you like to start operating new services using the 600 MHz band and/or geographic interleaved spectrum?:

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