

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?:

A protection clause is essential to protect existing users and to ensure that bidders are not undermined by the arrival of new services in adjacent channels. Ofcom should ensure that innovative solutions that meet government objectives in terms of broadband access for remote locations that bring social and economic benefits are not sabotaged as a result of deep financial pockets.

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

The protection from mobiles should extend to all services in adjacent bands, not just DTT.

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?:

No

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?:

No

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

Adjacent channel interference should be defined.

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

The social benefits of any system should also be considered as part of the non-technical issues when considering bid proposals. For example, broadband for unserved people in the UK. To accommodate the above the spectrum costs can be considered in a phased manner.

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?:

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

Our application is tailored towards rural areas where broadband services are limited, rather than urban conurbations. Most applications may be more biased to be the other way round.

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

No

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?:

Community systems, which provide benefits outside of a pure commercial basis, are hindered by a market-led approach. This is particularly true of a service which can provide numerous low-level applications for which funding for each may not be directly available.

The overall advantage provided by a system should be factored into the bid award process. In our case, the immense social and economic benefits from providing BWA infrastructure to remote locations should be considered.

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

All frequencies and geographical lots should be auctioned simultaneously so that bidders can ensure that they can obtain all the spectrum they require. Our application is currently considering a combination of both local and national frequencies as well as utilising interleaved spectrum where available.

The geographical lots should consider the coverage of existing DTT transmitting regions. This would ensure compatibility with existing antenna groups and also reduce potential interference issues.

The existing 8 MHz bands should remain in order to ensure DTT compatibility. Bidders may subsequently amalgamate adjacent bands to make a larger channel if required (and thus remove the intervening guard band to increase efficiency).

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

2 years after license issue on a staged roll-out.