



RESPONSE TO OFCOM'S CONSULTATION ON VARIATION OF THE 3G LICENCES (AND CONSEQUENT PROPOSAL TO VARY DRAFT 2GHz MSS/CGC BASE STATION LICENCES)

This comprises British Sky Broadcasting Limited's ("Sky's") response to Ofcom's consultation of 5 February 2010 on variation of the 3G spectrum licences and consequent proposals to vary draft 2GHz MSS/CGC Base station licences. This response is non-confidential.

Sky uses wireless cameras in production of Sky News and Sky Sports throughout the UK. Sky is concerned about the effect of the proposals on its ability to use such equipment if the proposals are implemented.

We have set out our response to Ofcom's specific questions below.

Are there any reasonable grounds why Ofcom should not grant the request to vary the five Wireless Telegraphy Third Generation Mobile Licences by increasing the permitted maximum in-band EIRP to 68dBm as soon as practicable? If so, please explain your reasoning for this.

Such an increase in power would cause increased difficulty for PMSE to use the limited spectrum available for wireless links. The use of 2105MHz is already problematic in major cities due to interference from 3G base stations, and this is expected to worsen with the proposed increase in power. The increase will also affect 2095MHz, the next channel down the band. Improved 3G filtering, as recommended to Ofcom by the SPMF Group, could reduce the interference into the PMSE band.

As a result, Sky does not consider that the variation of the licences should be granted. If, however, Ofcom is minded to grant the variation, we consider that it must make the variation subject to conditions ensuring improved 3G filtering.

Are there any reasonable grounds why Ofcom should not also apply the increased permitted maximum in-band EIRP to future 2 GHz MSS/CGC licences? If so, please explain your reasoning for this.

The use of this band and the increased power level will affect 2205 and 2215MHz, the lower two channels in the upper band for PMSE. Again, improved filtering would reduce such interference.

The overall affect is the potential loss of four of the eighteen channels which can be used for wireless links in the UK. Given the already sparse amount of spectrum available for wireless links, this would further serve to make it increasingly difficult for PMSE to supply the required coverage of future events.

As a result, Sky does not consider that the 2GHz MSS/CGC licences should be varied in this manner. If, however, Ofcom is minded to make the variation, we consider that it must make the variation subject to conditions ensuring improved 3G filtering.

Sky

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