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Mr Cesar Gutierrez
Ofcom
Spectrum Policy Group
Riverside House
2A Southwark Bridge Road
London
SE1 9HA

Your Reference

Our Reference

30 November 2009

Dear Mr Gutierrez,

MOD RESPONSE TO CROWN RECOGNISED SPECTRUM ACCESS IN 3400 – 3600 MHz

MOD welcomes the opportunity to comment on the consultation for crown recognised spectrum access in the 3400 – 3600 MHz band. The following answers are in response to the questions raised in the consultation document:

Extension of RSA to the 3400 to 3600 MHz band

Question 1: do you agree that we should introduce RSA in the 3400 to 3600 MHz?

Yes. MOD requires Crown RSA to exploit its spectrum holdings in 3400 – 3600 MHz inline with Cave recommendations.

Question 2: do you agree that we should extend the relevant regulations to allow Crown bodies to be granted and to trade RSA in the 3400 – 3480 MHz and 3500 – 3580 MHz blocks? If not, which frequency ranges do you think the RSA regulations should cover and why?

Yes, regulations should be extended to allow Crown bodies to be granted RSA and also to permit trading.

Terms and conditions of the RSA grant and the WT licences

Question 3: do you agree that there should be no minimum trading unit for the RSA grant and the WT licences arising from trade in the band?

Yes. MOD does not want to be constrained by minimum trading units but recognises the need to package spectrum appropriately at the time of release in order to obtain best use of the band.

Question 4: are there specific conditions that you consider should be included in RSA grants and WT licences arising from trading in the band?

MOD does not require specific conditions to be included in RSA grants.

Technical limits for base stations in the 3500 – 3580 MHz block

Question 5: do you agree with the proposed in block emissions limit for base stations in the 3500 – 3580 MHz block?

Yes, MOD agrees with the emission limits proposed.

Question 6: do you agree with the proposed out of block emissions mask at the 3500 MHz and 3580 MHz boundaries for base stations?

Yes, MOD agrees with the emission limits proposed. In addition, MOD observes that RSA regulations should allow MOD to be granted RSA for the whole block, hence the block boundaries are at 3500 MHz and 3580 MHz and the out of block conditions should be defined at those boundaries.

Question 7: do you agree that less stringent technical parameters should be permitted if agreed between neighbouring operators?

Yes, MOD supports the ability to permit less stringent parameters if agreed following discussions with neighbouring operators.

Question 8: should we align UK Broadband licence conditions for base stations at 3500 MHz and 3580 MHz with those in the RSA grants if and when UK Broadband requests us to do so?

Yes.

Technical limits for terminal stations in the 3500 – 3580 MHz block

Question 9: do you agree with the proposed in block emissions limits for terminal stations?

No comment.

Question 10: do you agree that the block edge mask should be based on the spectrum emissions mask from ETSI EN 302 623?

No comment.

Question 11: do you agree with our derivation of regulatory out of block limits for terminals and, if so, which of the proposed four alternative regulatory conditions do you think most appropriate?

No comment.

Question 12: should out of block limits for fixed, nomadic and mobile terminals be different?

No comment.

Question 13: should we align UK Broadband licence conditions for terminal stations at 3500 MHz and 3580 MHz with those in the RSA grants if and when UK Broadband requests us to do so?

Yes.

Technical limits at 3480 MHz

MOD would like to make stakeholders aware that it has not reached a decision on the arrangement of the 3400 – 3480 MHz block and therefore none of the options in paragraph 8.57 in Ofcom's consultation has been discarded yet.

In addition, MOD observes that RSA regulations should allow MOD to be granted RSA for the whole block up to 3480 MHz. Therefore, technical limits to protect UK Broadband network must be specified at the 3480 MHz boundary and not at 3475 MHz.

Question 14: do you agree that the technical limits at 3480 MHz should copy those at 3580 MHz when the use immediately below 3480 MHz is broadband wireless?

Yes.

Question 15: do you agree with the proposed technical limits at 3480 MHz for the scenario where the upper edge of the emergency services block does not change from the current allocation at 3475 MHz?

Yes. MOD agrees.

Question 16: do you agree with the proposed technical limits at 3480 MHz for the scenario where the upper edge of the emergency services block is moved to 3480 MHz?

Yes. MOD agrees.

Technical limits inside the RSA blocks after a partial trade

Question 17: do you agree that the technical conditions of the RSA grant at the 3500 MHz and 3580 MHz boundaries are the best option for the boundaries that will appear inside the 3500 – 3580 MHz block if the block is partitioned and traded into several smaller sub-blocks?

No comment.

Question 18: do you think that the out of block limits for broadband wireless base stations in Figure 8.2 are sufficient to protect air-to-ground videolink receivers in an adjacent block?

No comment.

Question 19: what are your views on the requirements for protection of air-to-ground videolink receivers from interference from broadband wireless terminals?

No comment.

Question 20: do you think that an out of block requirement for airborne videolink transmitters of -25 dBm/MHz EIRP is sufficient to protect broadband wireless receivers?

No comment.

(Original Signed)

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CIO J6 POL 5