Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: RuggedCom Inc

To (Ofcom contact):

Name of respondent: Noam Amram

Representing (self or organisation/s): Organisation

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CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing	X	Name/contact details/job title	
Whole response		Organisation	
Part of the response		If there is no separate annex, which parts?	

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Name Signed (if hard copy)

Responding to the 3.4 GHz consultation

Questions

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, we think that this band should be released to the market, as a certified WiMAX vendor we have products operating in these bands.

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, it should be released to allow both FDD and TDD operations.

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?
No, we suggest holding a minimum to prevent small gaps within the bands. Most deployments of WiMAX systems require at least 2 carriers of 10MHz, so the minimum shall be at least 20Mhz to support operators business. In addition, 20Mhz bandwidth will be a popular band in the following years allowing superior bandwidth efficiency (spectral diversity) and you should look to regulate the frequency while taking that in mind.

Question 4: are there specific conditions that you consider should be included in RSA grants and WT licences arising from trading in the band?
The most important is keeping the spectrum clean in the junctions between different operators i.e. ECC recommendation REC (04)05, which suggest guard bands on the expense of optional efficiency, especially on the edge of this spectrum. License of the frequency band shall support various business models in order to support various spectrum holders needs as well as assure of high spectral utilization. Therefore we believe that spectrum holders shall be able to lease their spectrum to other players in a country wide sense.

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?
We think that the limitations shall be with accordance to other EU countries as an example European commission decision for the 2.6 GHz band 2008/477/EC2 and general and

ETSI EN 302 326. We think that it would not be wise to require greater restrictions which may influence the ecosystem by requiring different equipments specially certified for UK, this may end up in business risks for all players of the ecosystem.

Question 6: do you agree with the proposed out of block emissions mask at the 3500 MHz and 3580 MHz boundaries for base stations?
No, we think ETSI relevant standards shall be applied.

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

Question 8: should we align UK Broadband license 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?
This shall be with UKBB conformance only.

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?

We believe that EU recommendations and ETSI shall apply.

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

Yes, special care though shall be made to support 2 carriers of 10MHz (WiMAX popular band) in 20M band. As explained in Q3.

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?
We believe that it shall be refined differently for Fixed and Mobile devices, also the mask for 10MHz does not comply to 20MHz future popular WiMAX band? Therefore we believe that internal guards should not be required.

Question 12: should out of block limits for fixed, nomadic and mobile terminals be different?
Yes, we believe that Fixed and nomadic shall be exempt as long as they comply with ETSI 302 326.

Question 13: should we align UK Broadband license 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?
This shall be with UKBB conformance only.

Technical limits at 3580 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?
We support restricted bands in 3575-3580 and guard bands in 3475-3480.

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.

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?

This shall be with UKBB conformance only.

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?
We believe that there shall be restricted bands between operators to avoid interferences.

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?

Yes.

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

We believe this is not an issue and that mobile wireless terminals will not interfere to air-to-ground videolink receiver as they transmit relatively low power.

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?

Yes.