

## General comments

I welcome the effort made by UK OFCOM to determine the best use of available spectrum. It is an excellent piece of work and has identified the many new areas that have real need for this valuable radio Real Estate.

Currently in Passive UHF RFID in Europe there are very few 'large scale' deployments when Reader talks First deployment is considered. The largest deployment is in the UK and is utilising the spectrum efficient, 250KHz bandwidth of tag talks first. The adoption of a new EN 302 208 does not resolve the sharing issues occasioned by the use of Passive RFID in UHF that results from dense reader mode. The proposal to allocate the additional 4MHz of spectrum to the industry does not, in and of itself, solve the issues surrounding this problem of deployment that can be solved far more effectively by adopting Tag Talks First deliverables which are proven considerably more effective in use.

The respondent, on behalf of many interested parties, makes clear that spectrum allocation does not change the cost to produce and deliver surrounding RFID adoption in passive UHF which is mostly impeded, and has failed to live up to the original spectrum grant demand basis, by the cost of the product. The real challenge, as those who have pioneered RFID in passive UHF have discovered is in the data management issues and no allocation of additional spectrum will impact this singular bar to adoption. The major beneficiaries of the current regime, and of any additional spectrum, are the dominant corporations, this allocation would in no way allow for increased use or expanded adoption in the SME community.

There is very limited use in the Supply Chain and certainly in pallets. The only known use in pallets is massively subsidised by the user. Retail Item level has been a beneficiary of Passive UHF but only due to advocacy by a user group based on a technical model. The same benefits can be derived from all other RFID allocated spectrum and with significant lower cost at the item level