Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: **The way forward for the future use of the band 872 - 876MHz paired with 917 - 921MHz**

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Name of respondent: Enrico Tosato

Representing (self or organisation/s): a cluster of ETSI ERM TG28 members that individually co-signed this response (see list specified in the consultation response attached to this cover).

Address (if not received by email):

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Nothing	X	Name/contact details/job title	
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Name Enrico Tosato Signed (if hard copy)

Responses to OFCOM Consultation **The way forward for the future use of the band 872 - 876MHz paired with 917 - 921MHz**	
General comments	This response to the OFCOM consultation document is submitted on behalf of a number of individual members of ETSI_ERM_TG28 that collectively co-signed this document and are listed below. The synonym “TG28 members’ cluster” mentioned in this document means members listed below. The following TG28 members’ cluster has endorsed this response. Analogue Devices(DK), ANITEC (Italian Information Communications & Consumer Electronics Technology Industry Association), Atmel Automotive GmbH (DE) Beyerdynamic GmbH (DE), Bolt-Consult (DK), Dresden University of Applied Sciences(DE), Hager Group (F), Low Power Radio Association (UK), Interessenverband Short Range Device Anwender Deutschland (DE), Robert Bosch GmbH (DE), Silver Spring Networks (UK), SIEMENS AG (CH), Somfy[IO-Homecontrol](F), Techem Energy Services GmbH (DE), Zarlink Semiconductor Ltd (UK). The TG28 members’ cluster welcomes the study that has been undertaken by OFCOM on the future of the band 872 – 876 MHz and the thoroughness of all of the issues considered in their consultation document. In its conclusion the consultation document states that the two main choices facing OFCOM are either to sell the band to the highest bidder/s or to make it available for use by RFID/SRDs on an unlicensed or light licensed basis. It is the opinion of TG28 members’ cluster that for these band Short Range Devices (SRD) should be taken into account as described in the ETSI SRDoc TR 102 649-2. This contribution is meant as additional input for OFCOM in order to support a decision in this way. In recent years, the use of UHF SRD has significantly expanded to meet a very broad range of applications. It is proposed to designate the frequency range of

	• 873 MHz to 876 MHz for devices with low duty cycles that can not co-exist in the same frequency range with current LBT + AFA devices and • 870 to 873 MHz frequency range for FHSS and DSSS systems with a 0,1 % D.C or LBT + AFA or equivalent mitigation technique.
Question 1: Do you believe that the uses listed in this section (Section 3) are possible candidates of the 872/917 MHz bands?	Although TG28 members' cluster recognise that it would be possible to auction the band, they have a strong preference to see the band 872 - 876 MHz designated for use by SRD. They also support the proposal to designate the band 917 - 921 MHz for use by RFIDs. A full justification for this proposal is contained in ETSI SRDoc TR 102 649-2
Question 2: Are there additional applications/services (not listed above (from Section 3) that could make viable use of the 872/917 MHz bands that Ofcom should be aware of?	There is no applications/services known by TG28 members' cluster It should be noted that TR 102 649-2 makes extensive reference to automatic metering. The SRDoc proposes that such applications, together with alarms, should operate in the band 874 - 876 MHz
Question 3: What services do you believe should be authorised to use this band? Could you supply relevant information supporting your preference and include any economic data relating to the value of the spectrum in providing these services?	We are aware that GSM-R has requested an extension of their band to include the frequency ranges 873 - 876 MHz and 918 - 921 MHz. Both TG28 members' cluster and the railway community believe that it is possible for SRD and RFID to share the uplink and downlink band with GSM-R. This view is based on feasibility tests that were performed between DB and TG28 members' cluster at the BNetzA test lab in Kolberg under the control of the BNetzA. (See document ETSI_ERM_TG34#23_03).
Question 4: Do you agree with the methods used to assess the potential to interfere with adjacent band services in a full licensed approach?	Not applicable to SRDs or RFID
Question 5: Do you consider that the proposed technical licence conditions would be justified and appropriate?	Not applicable to SRDs or RFID
Question 6: Do you agree with the methods used to asses the likelihood of services interfering with adjacent band services under the light regulatory approach?	It is accepted that SRDs and RFID would operate as secondary applications and shall not cause harmful interference to GSM devices operating in the same or adjacent bands. The use of separation distances, as proposed in the consultation document, is just one of a number of possible mitigation techniques that could be used to achieve compatibility. The feasibility tests at the BNetzA laboratory have shown that e.g. duty cycle restrictions allow coexistence between GSM (-R) and SRD.

Question 7: We would like stakeholder views on the cost and performance impact of the UMTS900 filters described above.	The SRD industry welcomes any action taken to improve the performance of UMTS receivers. It is a task mandated from EC to ETSI to think about the improvements of receiver parameters to increase the efficient use of spectrum in general.
Question 8: Are there are any other methods that would give the same protection as the filters? What costs and performance impacts would these have?	Outside scope TG28 members' cluster
Question 9: What are your views on the need for and justification of such mitigation measures and how their cost should be borne?	Outside scope TG28 members' cluster
Question 10: Stakeholders views are sought on whether the spectrum should be awarded as a single lot by frequency, or whether it should be split in to smaller frequency lots.	To fulfil the request of CEPT to increase the efficiency of spectrum use any coexisting scenarios of different users should be taken into account. This is valid also for segments of the related band.
Question 11: We would like stakeholder's views on whether the packaging should be split GB/NI or if we should proceed with UK wide packages.	From the perspective of TG28 members' cluster the package should include the whole of the UK including Northern Ireland. This takes into account the idea of a common European regulation and market for wireless products.
Question 12: Would it be practical for RFID users and adjacent operators (e.g. GSM, UMTS, GSM-R) to co-ordinate locally on a case by case basis? The answers to this will help Ofcom develop its views on whether a database would be required.	It is certainly the intention of TG28 members to ensure that SRD does not cause harmful interference with other users either in the same or adjacent bands.
Question 13: Do you agree with Ofcom's preliminary proposal that the separation distances suggest a light licensing regime if SRD/RFID use in this band were to be supported? If not, how should the interference into adjacent bands be managed?	The separation distances in the consultation document assume that no other mitigation techniques are implemented. An ETSI work item under the STF will investigate DAA and other equivalent techniques to ensure coexisting between different applications. The TG28 members' cluster is of the opinion that in general studies should be released when a service /application established a new spectrum segment to estimate the influence on adjacent user/bands.