

Title:

Mr

Forename:

TIM

Surname:

CULL

Representing:

Organisation

Organisation (if applicable):

MOTOROLA

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Comments:

Motorola is grateful for the opportunity to contribute to the process of spectrum development in this band.

We are responding to this particular consultation making only one specific point that appears to affect the entirety of the consultation. This is the likely need for revised spectrum arrangements in this band caused by a new allocation to GSM-R (the revision is sometimes

known elsewhere as eGSM-R)

It is Motorola's belief that due to the nature of the technology, the systems architecture and method of operation, the UK GSM-R service is very likely to suffer very considerable interference from the current GSM service and any later technology deployed in the so-called GSM 900 bands. This interference has already been seen in other countries and has been verified to be unacceptable.

There is a strong drive to address this interference problem on GSM-R by extending the current allocation down into this band by a further 2x3MHz. As this will be a harmonised action to cure a serious interference problem on an important service, it would seem likely that the same approach will have to be adopted in the UK.

Motorola believes this must radically change the plans for this band.

We hope this consideration is of assistance.

Question 1: Do you believe that the uses listed in this section (Section 3) are possible candidates of the 872/917 MHz bands?:

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?:

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?:

Question 4: Do you agree with the methods used to assess the potential to interfere with adjacent band services in a full licensed approach?:

Question 5: Do you consider that the proposed technical licence conditions would be justified and appropriate?:

Question 6: Do you agree with the methods used to assess the likelihood of services interfering with adjacent band services under the light regulatory approach?:

Question 7: We would like stakeholder views on the cost and performance impact of the UMTS900 filters described above.:

Question 8: Are there any other methods that would give the same protection as the filters? What costs and performance impacts would these have?:

Question 9: What are your views on the need for and justification of such mitigation measures and how their cost should be borne?:

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.:

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.:

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.:

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?: