

Title:

Mr

Forename:

Jacques

Surname:

Hulshof

Representing:

Organisation

Organisation (if applicable):

Nedap

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:

Yes

Comments:

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.

Nedap is strongly in favour of the second alternative since it would substantively meet the future needs

We strongly support the new four-channel plan as mentioned in the EN 302 208 version 2009 to be used in the upper band also.

Nedap will make use of the band for RFID-EAS

There is growing interest in using RFID tags for item level tagging of clothing. Published studies state that this can increase sales by up to 15% due to better inventory control and reduced out-of-stock items.

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

Nedap has a strong preference to see the band 917 - 921 MHz designated for use by RFID. We also support the proposal to designate the band 872 - 876 MHz for use by SRDs.

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?:

We are aware that GSM-R have requested an extension of their band to include the frequency ranges 873 - 876 MHz and 918 - 921 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 have requested an extension of their band to include the frequency ranges 873 - 876 MHz and 918 - 921 MHz. Both ERM-TG34 and the railway community believe that it is possible for RFID to share the upper band with GSM-R. This view is based on some informal feasibility tests that were performed between DB and ERM_TG34 at the BNetzA test lab in Kolberg. (See input 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 assess the likelihood of services interfering with adjacent band services under the light regulatory approach?:

Presumably SRDs and RFID would operate as secondary applications and shall not cause harmful interference to GSM devices operating in the same or adjacent bands.

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

Nedap would favour any action taken to improve the performance of UMTS receivers. However the RFID industry would resist any attempts to make them contribute towards the cost

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 Nedap

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 Nedap

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.:

Not applicable to Nedap

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 Nedap's perspective the package should include the whole of the UK including Northern Ireland

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 Nedap to ensure that RFID does not cause unacceptable 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?:

Yes I do agree, but other mitigation techniques are possible like shielding

