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Dear Steve

### **London 2012 Olympic Games and Paralympic Games Draft spectrum plan**

The Federation of Communication Services is the communications services industry trade association representing 300 companies delivering products and services by means of fixed, mobile, IP telephony and private radio systems. A list of our members may be found in the members' directory on the FCS website – [www.fcs.org.uk](http://www.fcs.org.uk)

We welcome the timely consultation on the draft spectrum plan, which emphasises the importance of access to radio spectrum to ensure the functioning of this important international event. Business radio services in general are vital for user organisations as essential inputs to their core functions. FCS has summarised the importance of business radio services and access to radio spectrum in its paper [Value of Business Radio](#)

The consultation explains that Ofcom believes that the PMR or business radio services will be supplied to the Olympic Family by Airwave:

*We expect the London Games to give rise to spectrum requirements unprecedented in their scale and complexity for a single event. Our objective is to meet the Government's spectrum guarantees, in respect of members of the Olympic Family. But there will also be high demand from non-rights-holding broadcasters, related activities such as cultural events and other services not covered by the Government's spectrum guarantees that are important to the success of the Games.*

However the scope of the terms "Olympic Family" and "guaranteed users" are not clearly defined and there may be additional users or organisations wishing to transmit two way communications within or at the peripheries of the games. Greater clarification of who is intended to use the Airwave system and LOCOG network would be helpful to assist the planning and responsiveness of other spectrum users.

FCS members can assist organisations outside of the LOCOG scope in a number of ways. For example licensees of third party services such as Common Base Stations and trunked systems that have coverage in the Olympic localities may be able to accommodate new or temporary

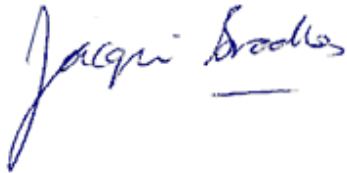
users during the period of the games. To assist visitors FCS will be listing such companies on the FCS website with an easy search facility.

We are concerned to note in section 3.22 of the consultation document that Ofcom may seek to vary or revoke some licences in order to accommodate Olympics users. We ask that this threat does not affect existing business radio licensees and users. We seek assurances from Ofcom and LOCOG that this will not apply to business radio licences which are generally used for mission critical purposes.

While Olympics are underway the consultative document notes that the field operations resources will be stretched. However life and business in London and the other venues will have to carry on as normal and licensees will each expect to receive the same level of services from Ofcom staff as they receive today. As with any event interference may occur through unlicensed use and we urge the Field Operations team to be vigilant and respond to complaints within the current Ofcom KPIs.

We have not answered any of the consultation questions directly as they appear generally to be directed to spectrum users, but please contact me should you have any questions on this response.

Yours sincerely



**Jacqui Brookes OBE**  
**CEO**