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Copsey Communications Consultants Response to Ofcom's Consultation on Innovation Licences

Copsey Communications Consultants welcomes the opportunity to comment on the Ofcom proposals for innovative licensing. As a company involved in the generation of international standards and lobbying for regulatory reform to maintain the drive towards more innovative and enabling wireless technologies and services, CCC can assess the Ofcom approach against that of other National authorities, and the requirements of manufacturers and service providers.

Ofcom has taken a realistic approach to a difficult subject and unlike the recent MOD statement on regulatory reform has taken sufficient account of the resources expended on trials over several years. From the early publicly funded experiments with radar industry has had a growing involvement. The next logical step is, as enabled in this consultation, a method whereby pilot trials can be turned into pioneer services.

There is therefore a broad agreement with all of the approaches taken. However there is one specific case that falls outside the suggested licensing approach. The larger of the trials to date have involved ships at sea, aircraft in flight and specialist vehicles. The cost of such trials is well beyond the usual small-scale local networks etc that seem to be envisaged here.

For example there is a possibility that a trials led approach to bandsharing could result in new ways of allocating Spectrum Usage Rights (SUR). It may be possible to use an extended test programme to define a model upon which all parties to a transaction can agree to base their fees and penalties. This would then prove a mechanism for the partial transfer of licenses that would be useful throughout the rest of the spectrum (whether Ofcom or public sector).

Once real-world measurement data (of the kind produced by the trials to date) is available an ETSI standard is often the route to bring forward further development, and the industry already carries this cost. However the first instance of such a trial would need to set up and validate the models and this would be very expensive.

Therefore in a case where a very significant regulatory issue could be solved by an expensive trial, special provisions should be available. The participants in such trials must be allowed to reclaim their costs in full whether by minimum period guarantees, longer revocation notice periods or the provisional allocation of an alternative testbed frequency as a backup. Such practical and contingency measures will enable early movers to make successful moves into these new spaces and bring innovation to the masses.

Copsey Communications Consultants would like to record a firm 'Yes' in answer to each specific question, with no comments further to the above.

Kind regards,

Brian Copsey

COPSEY COMMUNICATIONS CONSULTANTS

VAT No. 370159265 | Website: www.copsey-comms.com
Edgcott House, Lawn Hill, Edgcott, Aylesbury, Buckinghamshire, England HP18 0QW