Organisation:

Google

Question 1: Do you agree that the spectrum commons class of a technology should be based on its interference characteristics?:

Yes - this this looks like a reasonable approach

Question 2: Do you think that the ratio of channel bandwidth to the width of the band is a good representation of the use of the frequency domain resource and the interference potential of a technology in this domain?:

Question 3: Do you think that the duty cycle is a good representation of the use of the time domain resource and the interference potential of a technology in this domain? Do you agree that the duty cycle should be evaluated at the busy hour?:

Question 4: Do you think that the interference coverage plus the density of transmitters give a good representation of the use of the space resource and the interference potential of a technology in this domain?:

Question 5: Do you agree with our method to calculate the interference coverage area of a transmitter? What is your view on a threshold level of -80 dBm/MHz to determine the interference range? Do you think the threshold level should be expressed as power density (dBm/MHz) or as power (dBm)?:

Question 6: Do you agree with using a busy yet realistic scenario to derive the transmitter density of a technology?:

Question 7: Do you agree with the Interference Indicator being a product of the frequency domain factor, the time domain factor, the interference coverage area and the transmitter density?:

Question 8: Do you think that three classes of spectrum commons is the right number? What is your view on the proposed boundary values for the three classes?:

Question 9: Do you agree with our definition of fairness and that all systems should be required to behave in a fair manner?:

Question 10: What is your opinion on the effectiveness of blind detection sensing techniques compared to signal specific techniques?:

Question 11: Do you agree with the proposed polite rules?:

We support Ofcom's technology-neutral approach here and believe that the use of sensing as outlined is appropriate.

Comments:

Overall, we are very positive about the proposals made by Ofcom in the consultation document.

Ofcom's proposals for an Interference Indicator are interesting and are worth pursuing. Further development of the concept and its potential application will be needed.

We look forward to the progression of these ideas and their introduction into discussion in the relevant European bodies.