



**BT Response to the Ofcom Consultation on
Wireless Telegraphy Licence Exemption**

BT'S RESPONSE TO THE OFCOM CONSULTATION ON WIRELESS TELEGRAPHY LICENCE EXEMPTION

1. INTRODUCTION

BT is pleased to have the opportunity to comment on this Consultation Document on Wireless Telegraphy Licence Exemption. We believe that, used appropriately, licence exemption is a very useful tool to enable various radio devices to be used effectively, to the benefit of both the user and the various product markets. We also fully endorse the principle of aligning licence exempt operation, as far as possible, with other European countries; hence amending the UK regulations to conform with European Commission Decisions is fully supported.

2. BT'S RESPONSES TO THE SPECIFIC QUESTIONS

Question 1) Do you agree with our proposal to permit the licence-exempt use of BMA devices in specific spectrum bands using UWB technology?

In common with a number of other organisations, BT has had some concerns with the introduction of UWB technology, although these have been largely addressed by the extensive studies which have been undertaken within Europe. In the case of these devices for Building Material Analysis (BMA), this is particularly important, in view of the wide range of frequencies over which they are permitted to operate. However we believe that the requirements given in ECC Decision (07)01 are sufficient to ensure that these devices are only used in the very limited specialised applications for which they have been intended. We therefore accept that devices which operate in accordance with the requirements of ECC Decision (07)01 should not present a significant interference problem, even if operated on a licence exempt basis. We can therefore accept the proposal to licence exempt the use of BMA devices using UWB technology.

Question 2) Do you agree with our proposal to exempt users of HDFSS operating with e.i.r.p. no greater than 50 dBW in the 27.50 - 27.8185 GHz, 28.4585 - 28.8265 GHz and 29.4625 - 30 GHz bands from the need to possess a WT licence?

BT has for many years been a major user of all types of satellite services, and would agree that there is a significant market for HDFSS using VSAT terminals, particularly for the provision of corporate communications for multi-national corporations. This continues to be a growing market, and any simplification of the deployment process is to be encouraged, providing it can be addressed in a manner which will protect the neighbouring users of the frequency band. Consequently, we welcome the opportunity to operate these terminals on a licence exempt (uncoordinated) basis in accordance with the ECC Decision (05)01, as it will facilitate the growth of such HDFSS applications.

Question 3) Do you agree with our proposal to allow an increase in power for Meter Reading & Asset Tracking licence-exempt devices in the 169.4 - 169.475 MHz band to 500mW?

Recognising that there has been little commercial interest in using the ERMES paging system, BT is pleased that the decision has been made to designate this band for other applications. We believe that the applications that have been identified are all expected to be growing markets (and particularly the asset tracking devices), and these are all suitable uses for this band. Furthermore we recognise the requirement for the UK to apply the Commission Decision 2005/928/EC, and so we support these proposals for this band.

Question 4) Do you have any comments on our proposals to align with the draft Commission Decision relating to SRDs??

SRDs are typically very portable devices, which may be used in a wide range of locations, and in many cases will be carried from country to country, or may be purchased in one country for use in another. For this reason, BT has often stated its support for harmonising the regulations for such devices across Europe. Since the proposals made here by Ofcom are intended to align with European harmonisation, we support them, particularly as they are to comply with the requirements of an EC Decision, which will be a mandatory requirement for each EU Member State.

Question 5) Do you have any comments on our proposal to simplify the LMSS equipment listings in the Exemption Regulations and IR2016?

Licence exemption of mobile terminals is essential for the proliferation of such consumer devices, and this should apply equally to those for the Mobile Satellite Service. Recognising that the product range of such terminals does evolve, clear and simple identification of those devices that are licence exempt is to be encouraged, preferably in a form which does not require regular updating. We believe that this proposal to identify exempt products by linking them to the ETSI standard or other Common Technical Regulation would be a sensible balance between clarity and the requirement to maintain an up-to-date Interface Requirement.

3. CONCLUSION

BT has reviewed the proposals made by Ofcom in this Consultation Document on the various amendments to the WT Act Licence Exemption regulations, and we fully support all of the proposals that have been presented.