

## Intellect response to Ofcom consultation:

### Wireless Telegraphy Licence Exemption Amending the Wireless Telegraphy (Exemption) Regulations 2003

26 November 2007

Intellect is the UK trade association for the IT, telecoms and electronics industries. Its members account for over 80 per cent of these markets and include blue-chip multinationals as well as early stage technology companies. These industries together generate around 10 per cent of UK GDP and 15 per cent of UK trade. Members include companies in the business of fixed, wireless and satellite communications both upstream and downstream. For more information about Intellect go to: <http://www.intellectuk.org>.

Intellect welcomes this opportunity to comment on the proposed changes to the Wireless Telegraphy (Exemption) Regulations 2003 and to reply to the specific questions set out in the consultation document.

***Question 1) Do you agree with our proposal to permit the licence-exempt use of Building Material Analysis devices in specific spectrum bands using Ultra Wide Band technology?***

Providing the devices are operated in accordance with CEPT ECC Decision ECC/DEC (07)01 and the fact that the foreseen users include skilled worker, experts, historians and architects, Intellects agrees with the proposal.

***Question 2) Do you agree with our proposal to exempt users of High Density applications in the Fixed Satellite Service 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?***

Intellects welcomes the Ofcom proposal to exempt satellite earth station (SES) users in the Ka FSS band segments at 27.5000 – 27.8185 GHz, 28.4585 – 28.8265 GHz and 29.4625 – 30.000 GHz from the need to possess a WT licence, provided the SES user terminals operate below certain EIRP levels as described below.

Intellect specifically proposes that SES user terminals should be licence exempt in the above Ka-FSS band segments, provided that the SES transmit EIRP is less than 60 dBW (i.e. higher than the 50 dBW EIRP level proposed by Ofcom). The use of a 60 dBW maximum EIRP level would be consistent with the upper level of SES EIRP provided for in CEPT ECC Decision (06)03 on HESTs. This would support greater data transmission speeds from the SES user terminals, which would in turn support the achievement of broadband service delivery objectives in the UK through use of satellite platforms.

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Intellect also proposes that the CEPT ECC 'HEST' Decision be implemented fully to include the Ku FSS bands at 14.00 – 14.25 GHz. Intellect also welcomes the recent moves by Ofcom to lighten the regulatory burden by removing individual registration in the Ku FSS band 14.0 -14.25 GHz.

Intellect proposes that Ofcom increase the allowed SES transmit EIRP in the above Ku-band FSS bands to 60 dBW to enable greater data transmission speeds which would in turn support the achievement of broadband service delivery objectives in the UK through use of satellite platforms.

***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?***

Intellect agrees with these proposals.

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

Intellect has no comments on this proposal at this time.

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

Intellect has no comments on this proposal at this time.

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