



27 November 2007
SAP REG (07)75

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Dear Sir,

SAP REG is pleased to provide input to the consultation organised by Ofcom with a view of amending the Wireless Telegraphy Act to exempt certain apparatus from requiring a Wireless Telegraphy Licence.

Our comments will focus on the satellite terminals and satellite related issues relating to questions 1, 2 and 5.

In general, SAP REG supports a light touch approach, as introduced by the EU Authorisation Directive, whereby terminals and services that are unlikely to cause undue interference to other legitimate users and do not contravene international legislation are exempted from individual licence.

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?

SAP REG has previously submitted that devices using Ultra-Wide Band (UWB) technology have the potential to cause significant interference to many primary spectrum users, including mobile-satellite and fixed-satellite services.

However, for BMA equipment used under the detailed conditions proposed in the consultation under section 3.17, this risk is minimal. The satellite industry therefore has no objection against the exemption of BMA under the strict conditions stipulated.

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?

SAP REG supports in principle Ofcom's proposal to licence exempt users of High Density applications in the Fixed Satellite Service in the 27.50 - 27.8185 GHz, 28.4585 - 28.8265 GHz and 29.4625 – 30.000 GHz bands.

SAP REG would propose that full account should be taken of CEPT ECC Decision (06)03 on HESTs. This would result in the augmentation of the acceptable EIRP levels to 60 dBW maximum and the inclusion of the Ku FSS band 14.00 – 14.25 GHz (also covered within the scope of the above CEPT ECC Decision).

The increased EIRP levels would be in accordance with industry practice, allowing greater throughput and improved access to broadband services.

Inclusion of the Ku FSS band would be a logical complement to the recent easement by Ofcom of administrative overhead on terminals operating in this band by doing away with the requirement to register individual terminals. The market demand for such an exemption does exist to a large extent, and SAP REG does not consider that a differentiated approach in the user terminal licence exemption regime between Ka FSS and Ku FSS in this regard is justified.

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

SAP REG is fully supportive of a simplification of the equipment listings in Schedule 5 part IV of the Exemption Regulations and within IR2016 Annex A, as regards quoting the appropriate ETSI standard with the corresponding frequency and maximum transmit power requirements instead of referring to particular manufacturer and brand-name. This will create a non-discriminatory environment, in line with the way other types of terminals are exempted.

SAP REG is available for further information in case OFCOM would have questions.

Sincerely,

Kumar Singarajah