

The Chamber's 125 members (owning or managing some 730 merchant ships totaling about 18 million gross tonnes) accounts for 90 per cent of British shipping and represents all sectors of the shipping industry. These include ferries, cruise ships, container ships, tankers, dry bulk carriers, offshore support vessels, aggregate carriers and other specialist areas.

In considering our Memberships' interest, I have attached the Chambers response to the public consultation on the Spectrum Framework review. Our response is made in order to ensure that stakeholders concerns are fully considered, and to ensure that navigational safety and safety of life at sea is adequately addressed in a consultation that may not consider such a specialized area of interest.

In all cases, the Chamber would broadly support the concept of spectrum liberalization providing any measures undertaken were done so with a long-term goal in mind, and not just that of short-term financial gains without addressing underlying issues that exist within the spectrum and its management as a whole.

The Chamber of Shipping's response to the Public Sector consultation on Spectrum Framework Review.

Question 1: do you agree with Ofcom's proposed overall approach to improving the management of public sector spectrum holdings and, in particular, with Ofcom's conclusion that it will generally be preferable for public sector bodies to interact directly with the market?

The Chamber would support the idea of spectrum free-trade providing;

a) public sector bodies were monitored to ensure trade was done fairly and with no possible impact on frequencies used for navigation safety or lifesaving/GMDSS services

b) any spectrum traded could not have future applications in the lifesaving/GMDSS spectrum or would in no way be beneficial to new navigation services, thereby denying potential improvements to maritime health & safety

Question 2: what factors do you consider Ofcom should take into account in determining the programme of reform in the framework for managing public sector spectrum holdings?

- Navigational safety & potential impacts upon it by removal of equipment by non-mandated carriers
- Thorough engagement of stakeholders and addressing of their concerns
- Effects of national policy on international agencies, foreign bodies and international trade
- Potential costs to end-users through spectrum pricing and potential requirements for new equipment
- Financial impacts on UK SAR services that rely on charitable funding
- National security impacts

Question 3: do you consider that the proposals should be phased in?

Yes, providing that upon completion, each phase is reviewed and assessed in relation to previous conditions and conditions following the next phase to be introduced. In assessing each phase, consideration must be made of the concerns listed under Answer 2

Question 4: do you agree with Ofcom's proposals about the frequency bands that offer the greatest potential benefits from band sharing? Are there other frequency bands where the facility to trade or lease spectrum from public sector bodies would be particularly attractive?

Only if guarantees can be made that band-sharing technology is 100% secure, and there would be no detrimental effect on maritime navigation and safety services.

Question 5: do you agree with Ofcom's proposed approach to awarding public sector licences and RSA?

No comment

Question 6: should public sector spectrum trading be introduced at this stage in the Channel Islands and Isle of Man?

No comment, providing that stakeholder concerns and safety issues were addressed satisfactorily by each Government accordingly.

Question 7: should there be additional grounds, eg safety-related, for Ofcom to refuse consent to a proposed trade in certain frequency bands or for certain applications?

Any proposed trade that may impact upon safety of life, property or cargo, or national security, or could result in detrimental effects to financial and trading relations should be prevented at all costs.