

**Title:**

Mr

**Forename:**

James Ian

**Surname:**

Edwards

**Name and title under which you would like this response to appear:**

Ian Edwards

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**What do you want Ofcom to keep confidential?:**

Keep nothing confidential

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

You may publish my response on receipt

**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?:**

Not completely, if spectrum is being under used by public bodies it should be reviewed, however the marine VHF band is extensively used by leisure sailors, both motor and sail as well as by the MCA and the RNLI. The cost to the user community of any equipment change will be large and take many years to effect. Any attempt to charge for leisure users for use of the spectrum will be very expensive and difficult to enforce. It will simply drive users to use mobile phones, which lack the? broadcast facility?, the loss of which will have a significant effect on offshore 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?:**

1. The cost to the users who may have to change equipment.
2. Safety in all it's aspects.
3. Only if the above are 100% satisfied should the spectrum be sold.

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

If the above is satisfied, then phasing in is merely a matter of convince. I suspect that phasing in will be necessary to reduce administrative load and to allow new equipment to be developed, manufactured and deployed.

**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?:**

No comment

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

Only if my first point is completely satisfied

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

No comment

**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?:**

YES

**Comments:**