

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?:

no view

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?:

no view

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

no view

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 view

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

no view

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

no view

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?:

The National Beach Safety Council understands the need for a review and restructure of the spectrum. It believes that the frequencies used by those engaged in maintaining the safety of our coasts should be exempt from any kind of liberalisation that may incur costs being passed on to the end user.

Beach lifeguards use many of the frequencies under consideration, and any increase in costs would seriously jeopardise their ability to look after the safety of the public. Furthermore their ability to communicate with the Search and Rescue organisations and the Coastguard would be reduced, with obvious safety implications. It would

seem to be counter-productive to introduce extra costs to organisations who are safeguarding the public, and is probably not the intention of the process.

Comments:

The National Beach Safety Council represents local authorities and other beach operators, particularly on matters that concern safety.