

**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?:**

NPIA welcomes Ofcom's proposal for public sector spectrum bodies to play an active role in managing their spectrum holdings . The drive to interact directly with the market in the future to obtain new spectrum is understood but we have reservations as to whether this this approach will be beneficial for the police. The approach may increase overall expenditure for the police service with little to be gained. Much of the police spectrum is either allocated for national services on a secondary basis and therefore already shared. Any scope to release spectrum into the market is limited and would only be available in rural areas where demand is low

**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?:**

To enable the public safety spectrum bodies to have an active participation in market trading the public spectrum holdings must start on a level playing field, e.g. no disparity between private and public sector licensing fees.

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

Yes . They must be phased-in to enable the pubic sector spectrum bodies time to establish the trading platform and the extend to which it is able to interact effectively with the market. Time is also required to profile public sector spectrum holdings to meet future requirements, for sharing and release back into the market.

Most importantly, NPIA may not have sufficient funds to cover spectrum costs if this proposal is not phased in. The lack of information from Ofcom on AIP rates for some of the Public sector spectrum holdings has made it difficult for us to formulate a realistic bid into the Home Office CSR.

**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?:**

Until the profiling of public sector spectrum holdings takes place this cannot be answered. However the bands cover a specific area of spectrum where the emergency services have an interest.

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

Yes . The proposed approach to award RSA will enable NPIA to maintaining the operational effectiveness of the police service.

**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, where operational effectiveness of the emergency services could be compromised or where the frequency bands are harmonised with neighbouring states for public safety use.

**Comments:**